

# **EXHIBIT 50**

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3

	JOHN RIORDAN	PAGE
2		
3	Examination by Ms. Samuels	5

## **E X H I B I T S**

(No Exhibits Marked)

24 INDEX

	JOHN RIORDAN	
5		6
1	(Witness Sworn)	1 feed on during the deposition. We are kind of at a
2	JOHN RIORDAN,	2 disadvantage for Mr. Riordan to be able to interpret
3	called as a witness herein, after having been first	3 what you're saying, when relying only upon the audio.
4	duly sworn, was examined and testified as follows:	4 It would be helpful if he could see you
5	EXAMINATION	5 as well when you're speaking.
6	BY MS. SAMUELS:	6 BY MS. SAMUELS:
7	Q Can you hear me all right, sir?	7 Q Mr. Riordan, are you unable to understand
8	A I can hear you. I can't see you, but it's	8 what I'm saying when I speak.
9	fine.	9 A It would help to see your face.
10	Q Okay. Can you please state and spell your	10 Q Sure. All right.
11	name for the record?	11 A Thank you.
12	A Sure. It's John, J-o-h-n, Riordan,	12 Q When was the last time you gave a deposition?
13	R-i-o-r-d-a-n.	13 A I don't recall specifically. A number of
14	MS. SAMUELS: This is the deposition of John	14 years ago.
15	Riordan taken in the case of Walker versus City of	15 Q All right. So, essentially, it's the same
16	Chicago, et al, Case No. 20 CV 7209.	16 thing as testifying under oath. All your answers have
17	This deposition is taken pursuant to	17 to be verbal, swearing to tell the truth.
18	notice, by agreement of the parties and all applicable	18 If at any point you want to take a
19	rules.	19 break, you can. And if any of my questions are
20	BY MS. SAMUELS:	20 unclear, ask me to rephrase them, otherwise, I'm going
21	Q Have you ever given a deposition before, sir?	21 to assume you understood what I was talking about,
22	A I believe once.	22 okay?
23	MS. STALF: Can I just interject for one	23 A I understand. Thank you.
24	second? Jeanette, could you please keep your camera	24 Q Okay. Did you prepare at all for your
7		7
1	deposition today?	1 MS. ADEEYO: My apologies. I don't mean to
2	A Somewhat, yes.	2 interrupt, but another attorney, Breana Brill is
3	Q Okay. And what did you do to prepare for	3 attempting to join this deposition. It's my
4	your deposition?	4 understanding she's in the waiting room.
5	MS. STALF: I'm going to object to the	5 So can she please be let in? Thank you.
6	question just to the extent that this question may	6 BY MS. SAMUELS:
7	elicit any attorney/client communication.	7 Q Did you review any general progress reports?
8	That being said, to the extent that you	8 A I believe some, yes.
9	can answer the question without eliciting such	9 (WHEREUPON, Ms. Breana Brill enters
10	communications, you can answer, Mr. Riordan.	10 the conference room.)
11	THE WITNESS: I reviewed some reports and	11 BY MS. SAMUELS:
12	some prior testimony.	12 Q Are there any other records you recall
13	BY MS. SAMUELS:	13 reviewing?
14	Q Whose prior testimony did you review?	14 A I'm sorry, I didn't understand.
15	A My prior testimony.	15 Q Are there any other records you recall
16	Q And whose reports did you review?	16 reviewing?
17	MS. STALF: Object to the form. Foundation.	17 A No.
18	You can answer.	18 Q Did you review any videos?
19	THE WITNESS: The reports that involved	19 A No.
20	myself.	20 Q Besides with your attorneys, when is the last
21	BY MS. SAMUELS:	21 time you discussed this case?
22	Q Did these reports have a title?	22 A I can't recall. It's years ago.
23	A Yes, ma'am. Supplementary reports from the	23 Q So in the last two or three years, besides
24	Chicago Police Department.	24 with your attorneys, have you discussed this case with

1 anyone?

2 A No, ma'am.

3 Q Did you ever learn that Xavier Walker had  
4 filed a post-conviction and/or was challenging his  
5 conviction?

6 MS. STALF: Object to the question, to the  
7 extent it may seek information protected by the  
8 attorney/client privilege.

9 With that being said, you can answer  
10 this question to the extent that you can without  
11 divulging such communication, Mr. Riordan.

12 THE WITNESS: I was not aware.

13 BY MS. SAMUELS:

14 Q And is it fair to say that --

15 Is it fair to say that since this case  
16 concluded in the early 2000s with the conviction of  
17 Mr. Walker that the next time it came up for you was  
18 this litigation?

19 A I wasn't -- okay -- it would be fair to say  
20 maybe even a little before the conviction. I don't --  
21 I don't recall specifically the time that Mr. Walker --  
22 the timeframe Mr. Walker was convicted.

23 Q When I say Xavier Walker, do you know who I'm  
24 referring to?

JOHN RIORDAN

9

10

1 A Yes.

2 Q Okay. And when I say Jovanie Long, do you  
3 know who I'm referring to?

4 A Yes.

5 Q What about Maurice Wright?

6 MS. STALF: Object to form.

7 THE WITNESS: I don't recall specifically,  
8 but his -- I believe his name is in the reports.

9 BY MS. SAMUELS:

10 Q But besides reading his name in the reports,  
11 you don't have any knowledge of Maurice Wright; is that  
12 fair to say?

13 MS. STALF: Objection. Form. Foundation.  
14 You can answer the question.

15 THE WITNESS: Yes.

16 MS. STALF: Just so you know, you can answer  
17 the question even if I object unless I instruct you not  
18 to, okay?

19 THE WITNESS: Okay.

20 BY MS. SAMUELS:

21 Q If I say Antwoine Waddy, do you know who I'm  
22 referring to?

23 A I'm sorry. Antwoine; I didn't catch the last  
24 name.

11

12

1 Q Waddy?

2 A I have no recollection of Antwoine Waddy.  
3 Q Prior to the -- your investigation into this  
4 murder -- when I say Merak Majdak, do you know who I'm  
5 talking about?

6 A Yes.

7 Q And you said you know who I'm talking about  
8 when I said that?

9 A Yes.

10 Q Okay. So prior to your investigation -- your  
11 role in helping to investigate the murder of Merak  
12 Majdak, had you had any interactions with Xavier  
13 Walker?

14 MS. STALF: Objection. Form. Foundation.

15 MS. ADEEYOO: Join.

16 THE WITNESS: No, Counsel.

17 BY MS. SAMUELS:

18 Q Okay. Prior to your role in helping to  
19 investigation the murder of Merak Majdak, had you had  
20 any interactions with Jovanie Long?

21 MS. STALF: Objection. Form. Foundation.

22 MS. ADEEYOO: Join.

23 THE WITNESS: No.

1 BY MS. SAMUELS:

2 Q So is it fair to say the first time you came  
3 to learn anything about Xavier Long -- excuse me.  
4 The first time you came to learn  
5 anything about Xavier Walker or Jovanie Long was during  
6 the course of your investigation into the murder of  
7 Merak Majdak?

8 MS. STALF: Objection. Form. Foundation.

9 MS. ADEEYOO: Join.

10 THE WITNESS: Yes.

11 BY MS. SAMUELS:

12 Q What was your date of appointment?

13 MS. STALF: Objection. Form.

14 THE WITNESS: Eight, September, 1986.

15 BY MS. SAMUELS:

16 Q Where were you originally assigned?

17 A My very first assignment?

18 Q Yes, sir.

19 A The 23rd District.

20 Q And, roughly, what area does that cover or  
21 did that cover at the time?

22 A At the time, I believe it -- boundaries were  
23 Clark to Fullerton to Lawrence to the lake.

24 Q And how long did you remain at the 23rd

	13		14
1      District?		1      assignments -- or did you have any other assignments	
2            A    I would estimate for training and maybe a		2      other than Patrol Officer while you were with the 24th	
3      month or two afterwards, so less than six months.		3      District?	
4            Q    And where was your next assignment after		4            A    No. My rank was Patrolman.	
5      that?		5            Q    Were you ever assigned to any specialized	
6            A    The 24th District.		6      units?	
7            Q    And where does -- at that time, where was the		7            A    I was on the Tack Team for a short time.	
8      24th District, approximately?		8            Q    What's the Tack Team do?	
9            A    You want the boundaries?		9            MS. STALF: Objection. Form. Foundation.	
10          Q    Yes, sir.		10          MS. ADEEYO: Join.	
11          A    Okay. Basically, 6000 North to the City		11          THE WITNESS: Basically, work on chronic	
12      limits North, the border of the Evanston, from the		12      crime problems in the district. At that time, we got	
13      Chicago River to the Lake Front.		13      detailed out a lot across the city for events, such as	
14          Q    All right. And how long do you stay with the		14      like Taste of Chicago and things like that.	
15      24th District?		15      BY MS. SAMUELS:	
16          A    You have to give me a second.		16          Q    Did you receive any specialized training to	
17                 To the best I can recall, late 1994 to		17      join the Tack Unit?	
18      late 1995.		18          A    No.	
19          Q    All right. So approximately '87 to '95?		19          Q    Do you remember who your Sergeant was?	
20          A    Something close to that, yes.		20          MS. STALF: Objection. Form. Foundation.	
21          Q    And during that time, were you a Patrol		21          THE WITNESS: I don't recall. I -- give me	
22      Officer?		22      a -- I -- I have -- one of them was being Daniel	
23          A    Yes.		23      Betlof, and I had another one but I don't recall his	
24          Q    All right. Did you ever have any other		24      name.	
	15		16
1      BY MS. SAMUELS:		1            Q    And how -- how many units were in Special	
2            Q    Besides the Tack Unit, were there any		2      Operations?	
3      specialized teams you worked on while you are in the		3            MS. STALF: Objection. Form. Foundation.	
4      24th District?		4            MS. ADEEYO: Join.	
5            A    I worked on a burglary car.		5            THE WITNESS: I'm not sure what you are	
6            Q    Can you explain what that is, briefly?		6      asking.	
7            A    Basically we investigated residential		7      BY MS. SAMUELS:	
8      burglaries and thefts in the 24th District.		8            Q    Sure. Was it just like one big division?	
9            Q    Did you receive any specialized training to		9            MS. STALF: Objection.	
10      work the burglary car?		10          MS. ADEEYO: Join.	
11          A    No.		11          THE WITNESS: It was one unit inside Special	
12                 MS. STALF: Objection. Form.		12      Operations at the time was what they called HBT, which	
13      BY MS. SAMUELS:		13      is now the SWAT team.	
14          Q    And so around '94, '95, you leave the 24th		14      BY MS. SAMUELS:	
15      District, correct?		15          Q    Is that what you were on?	
16          A    Correct.		16          A    No. I never went on SWAT.	
17          Q    Where is your next area of assignment?		17          Q    Okay. So my understanding is that Tack Teams	
18          A    Special Operations.		18      generally have, like, six to eight members; is that	
19          Q    What does a Special Operations Unit do?		19      like -- does that sound about right?	
20                 MS. STALF: Objection. Form. Foundation.		20          MS. STALF: Objection. Form. Foundation.	
21                 THE WITNESS: We are deployed citywide to		21          MS. ADEEYO: Join.	
22      deal with spikes in crime. I would guess that's what		22          THE WITNESS: It varies. I would say it	
23      you would call it. We had deployment.		23      would be fair to say -- it's supposed to have eight to	
24      BY MS. SAMUELS:		24      ten members. I don't know. Currently, or -- I should	

	17		18
1    say just previous to my retirement, some teams ran with 2    six. But I believe it's eight.  3                 And then a number of Tack Teams in the 4    district also fluctuate, so it's any -- I mean, it's -- 5    is that good enough, or --  6    BY MS. SAMUELS:  7    Q    Yeah. So was Special Operations separated 8    into teams?  9    A    Yeah, it was a team environment.  10   Q    Do you recall how many teams there were?  11   MS. STALF: Objection. Form. Foundation.  12   MS. ADEEYO: Join.  13   THE WITNESS: No, I don't.  14   BY MS. SAMUELS:  15   Q    What team were you on?  16   A    I was on a rotating team. I worked days and 17   nights. And then for a while I was on a straight day 18   team.  19   Q    When you say you were on a rotating team, 20   does that mean the members changed, or does that mean 21   the time that you worked changed?  22   MS. STALF: Objection. Form. Foundation.  23   THE WITNESS: Maybe -- well, hours definitely 24   changed. It's what rotation refers to. I believe some	1    of the teams work straight shifts, so the members would 2    change also.  3                 So I -- that's probably the best I can 4    answer it. I don't --  5    BY MS. SAMUELS:  6    Q    Who were the other members of your team? 7    A    At which times? They changed. I don't 8    recall specifically all of the members that I worked 9    with while I was there.  10   Q    Who can you recall? 11   A    Pat O'Malley, Anna Gall, Rodney Omochy, Mike 12   Cunas, Sal Perez, Eddy Mirras. I can't -- I mean -- 13   and then -- that would change all the time.  14   Q    Gotcha. Did you have a Sergeant who you 15   generally reported to while you worked in special 16   operations?  17   A    I had several.  18   Q    Who can you recall? 19   A    Well, one just passed away, Pat Gordon. 20   Q    I'm sorry for your loss. 21   A    And John Locknene. I mean, there were a 22   couple others. I'm trying to think -- Wagner. I can't 23   remember his first name. I think it might be Bill.  24   Q    And you said when you are on Special Ops, you		
	19		20
1    work throughout the city.  2    A    We would be deployed to different areas of 3    the City, correct.  4    Q    Did you have to receive any special training 5    to joint Special Ops?  6    A    No.  7    Q    How long were you with Special Ops? 8    A    So I could say in general, I believe like, 9    '95 to '98.  10   Q    And then why did you leave Special Ops? 11   A    I was promoted. 12   Q    To what? 13   A    Gang Specialist. 14   Q    All right. And was that with a specific 15   area? 16   A    I'm sorry, could you repeat that? 17   Q    I said was that with a specific area. 18   MS. STALF: Objection. Form. Foundation. 19   THE WITNESS: I'm sorry. I don't understand 20   what you are asking me. Was -- Gang Specialist is a 21   rank.  22   BY MS. SAMUELS:  23   Q    And what -- I guess, so -- let me try to 24   preface where I'm coming from and see if you can pick	1    up where I'm coming from.  2                 And so we were sort of going through 3    your areas of assignment, right. And so you started 4    at, I believe, 23rd and went to 24th, then you went to 5    Special Ops.  6                 And so I understand that you've been 7    promoted to Gang Specialist. And so is that City wide, 8    or is that, like, Gang Specialist for the 15th District 9    or -- do you get what I'm trying to say?  10   A    It's actually -- Counsel, it's a rank. It's 11   equivalent -- at the time it was equivalent to 12   Detective and Youth Officer. And it was a City wide 13   unit, also.  14   Q    Oh. 15   A    I took a test and was promoted to Gang 16   Specialist. It was called the D2A test at the time. 17   Q    And what were your responsibilities as a Gang 18   Specialist? 19   A    Basically, to investigate gang-related 20   narcotic sales, the hierarchy of the structure, do some 21   narcotic conspiracy cases at the street level.  22                 And I wasn't fortunate, but some members 23   of Gangs would work with Federal agencies. 24   Q    And was there a particular -- excuse me --		

	21		22
1    was there a particular building that you worked out of		1    Investigations, correct?	
2    as a Gang Specialist?		2    A    Correct.	
3       A    Yes, Counsel. Homan Square.		3       Q    And when you were in Gang Investigations, was	
4       Q    What district is Homan Square in?		4    that still out of Homan Square?	
5       A    The 11th District. It's on the south end of		5       A    Yes.	
6    the 11th District.		6       Q    Okay. Then after Gang Investigations, then	
7       Q    Okay. And how long did you work as a Gang		7    where did you go?	
8    Specialist?		8       A    I was assigned to Area 4.	
9       A    Well, how long did I work in Gang		9       Q    And is this still as a Gang Specialists, or	
10   Investigations, or how long was I Gang Specialists		10   did you have a different title?	
11   total?		11       A    It's still as a Gang Specialist, but	
12       Q    Which one is shorter?		12   basically, I -- I can't tell you exactly how many	
13       A    I was a Gang Specialist for about, roughly,		13   members, but several ones were sent to the area,	
14   five years.		14   Detective Division, to work with Detectives.	
15       Q    Okay. And how long did you work Gang		15                   So they kind of -- they didn't disband	
16   Investigation?		16   Gangs, but they combined it with Narcotics. And I can	
17       A    As best I can remember, probably a year and a		17   even -- I can maybe guess at a percentage.	
18   couple of months -- a little more than a year,		18                   But, like, the majority of us were sent	
19   somewhere in that timeframe.		19   to area Detective Division units across the City.	
20       Q    All right. So, roughly, from '95 to '96ish,		20       Q    Okay. And what geography does Area 4 cover,	
21   '97?		21   roughly?	
22       A    No, ma'am. Like '99 to some time in 2000,		22       A    So it covered the 11th District -- it's	
23   like, May or something like that.		23   located above the 11th District -- tenth District, the	
24       Q    Okay. That's when you were in Gang		24   13th District, which I don't think it exist anymore --	
	23		24
1    I know it doesn't exist anymore, the 12th District.		1                   THE WITNESS: I don't recall specifically.	
2                   And I can't recall specifically, but I		2   Basically, I'm not sure if I got there in early --	
3   know at one time it covered the 1st District. I don't		3   obviously, early June. But we were sent for additional	
4   know. And then we -- so I don't know exactly when the		4   training before we were assigned to the areas.	
5   1st District was -- so let me go over it again.		5                   And I believe that was, maybe in May or	
6                   Ten, 11, 12 and 13. And at one point,		6   late April of, oh, what year is it, 2000?	
7   the 1st District, which is downtown, also.		7       MS. SAMUELS: Yes, sir.	
8       Q    I gotcha. And so my understanding is,		8                   THE WITNESS: So I would -- I can't recall	
9   essentially, you are doing the same role as Gang		9   specific dates, and I'm unable to figure out exactly.	
10   Investigation, but you are just partnered up with		10   But, basically, we were assigned to the areas. They	
11   Detectives?		11   sent us for additional training, and then they put us	
12       MS. STALF: Objection. Form. Foundation.		12   in Detective Division.	
13       THE WITNESS: No. Actually, we were doing		13   BY MS. SAMUELS:	
14   the role of Detectives, and we were Gang Specialists.		14       Q    And how long did you remain in the Detective	
15   BY MS. SAMUELS:		15   Division?	
16       Q    Okay.		16       A    So from -- like, around mid 2000 to December	
17       A    So flip-flop, they put us into the areas to,		17   of 2003.	
18   basically, do the duties that a Detective would do.		18       Q    And you said you -- you received additional	
19       Q    Okay. And is that what you were doing at the		19   training?	
20   time of this case?		20       A    Yes.	
21       A    Yes.		21       Q    And do you recall what that training was	
22       Q    Okay. And how were you working Area 4 for,		22   about, generally?	
23   sort of, as a Detective?		23       A    Basically, I recall -- what I do recall is	
24       MS. STALF: Objection. Form. Foundation.		24   some of it was evidence recovery, theft investigations,	

	25		26
1      A    interviews.		1      Q    Okay. And so were you responsible for, like,	
2                 General -- like, the same training that		2      overlooking paperwork to make sure it's accurate,	
3      Detectives had had that Gang Specialists didn't, is the		3      making sure everybody -- just make sure the shift goes	
4      best way I could probably describe it.		4      okay, I guess?	
5      Q    And then from -- after 2003 -- I think you		5      MS. STALF: Objection. Form. Foundation.	
6      said you were there until approximately December 2003,		6      THE WITNESS: Do you kind of want me to	
7      correct?		7      define, like, what a Patrol Sergeant does?	
8      A    Correct.		8                 You know, you're a front-line	
9      Q    All right. Where do you go after that?		9      supervisor. So, yes, I would review and approve	
10     A    I was promoted.		10     reports. I would respond to calls. There are some	
11     Q    To?		11     calls that you know -- that you are required to respond	
12     A    To Sergeant.		12     to, by you know, rules, like domestics, if you are	
13     Q    Congratulations. What area?		13     available. And I'm responsible for -- bless you.	
14     A    Thank you.		14     BY MS. SAMUELS:	
15                 Well, first, the Academy and then to the		15     Q    I'm sorry. Go ahead.	
16     19th District.		16     A    And I'm responsible for check off, make sure	
17     Q    Generally speaking, what's the geography of		17     everybody would come in at the end of the tour, that	
18     the 19th District?		18     the reports were finished. And another duty was to	
19     A    Give me a second. I know it. I believe it's		19     make sure there were response to calls.	
20     Fullerton. So 2400 North, to 4800 north, from Clark		20                 So, basically, I mean -- for the most	
21     Street west, to Chicago River.		21     part, I was a Patrol Sergeant. I didn't work in the	
22     Q    And what were your responsibilities as a		22     inside -- in the administrative Sergeant spot.	
23     Sergeant?		23     Q    Okay. And you did that -- I don't know.	
24     A    I was on midnights and Patrol.		24     How long were you a Sergeant?	
	27		28
1      A    To -- so, basically, 2004 to October, 2010 --		1      THE WITNESS: I believe I left there in 2008.	
2      a little more than six years I'm guessing. I can		2      So that make -- December -- 2003 --	
3      figure out the math. In 2010, I was -- in October of		3      MS. STALF: You are doing it again.	
4      2010 I was promoted to Lieutenant.		4      THE WITNESS: Under five years -- close to.	
5      Q    In those six years, were they all with the		5      Somewhere, four and a half years, somewhere close	
6      19th District?		6      there.	
7      A    No. No, Counsel.		7      BY MS. SAMUELS:	
8      Q    Okay. How long were you with the 19th		8      Q    So, roughly, until 2008 some time?	
9      District as a Sergeant?		9      A    Correct.	
10     A    I went to the Targeted Response Unit. I		10     Q    Okay. And then after the Targeted Response	
11     can't -- maybe less than a year. You know, I can't		11     Unit, where did you go?	
12     give you specific -- I can tell you I was in 19 for		12     A    To the 20th District.	
13     maybe less than a year. And then I went to the		13     Q    And how long were you with the 20th District?	
14     Targeted Response Unit.		14     A    From, I believe, summer of 2008 until October	
15     Q    And how long were you with the Targeted		15     of 2010.	
16     Response Unit?		16     Q    And what is a Targeted Response Unit?	
17     A    So more like, give you -- 2004 -- give me a		17     A    It was -- basically, we were sent to areas	
18     second, I'm sorry, Counsel.		18     where there were spikes in crimes to backup the Patrol	
19     Q    No problem.		19     Division, just give them extra support.	
20     A    I'm trying to give you the most accurate,		20     Q    And then I believe in 2000 --	
21     so --		21     A    I'm sorry. We were sent to specific	
22     MS. STALF: Just so you know, don't think out		22     locations to help out districts.	
23     loud, because the court reporter will struggle to try		23     Q    Okay. Was that in -- was that sort of like	
24     to take that down, so --		24     what you were doing for Special Ops?	

	JOHN RIORPAN	
	29	30
1	A It's similar in that aspect and different in	1 District. I'd have to estimate for -- oh, several
2	others.	2 months -- maybe close to a year. And then they started
3	Q Okay. Can you explain how it was different?	3 merging districts.
4	A Well, I don't believe we rotated. And we --	4 So the 23rd District, which parallels
5	our deployments were a little more confined. So I	5 northern and southern borders of the 19th District,
6	believe it was straight nights. That's like one of the	6 they combined those two districts. And when they did
7	differences.	7 that, I was sent to the 8th District. That's where I
8	And then -- for them, you know, a lot of	8 was -- I was sent there.
9	the same functions. It was more data driven where they	9 And I was in the 8th District for close
10	would deploy us.	10 to a year. And then I was able to go back to the 19th
11	Q Okay. And then in 2010 you're promoted to	11 District after somebody had retired or something. I
12	Lieutenant.	12 don't recall specifically, but I was able to go back
13	A Correct.	13 there.
14	Q And where -- what area were you the	14 And I ended up staying in 19th until --
15	Lieutenant over?	15 I guessing around 2014.
16	MS. STALF: Objection. Form. Foundation.	16 Does that help?
17	THE WITNESS: The 19th District. I went back	17 Q Yes, that was perfect.
18	to the 19th District.	18 Sorry. I'm trying my best not to cough
19	BY MS. SAMUELS:	19 in everybody's ears. I apologize.
20	Q Okay. And how long were you a Lieutenant in	20 What -- sort of like how you explained
21	the 19th District?	21 what a Sergeant does, can you explain what a Lieutenant
22	A It's kind of a complicated question.	22 does?
23	Q All right.	23 A Well, basically -- if -- I mean, just in
24	A If you want me to -- I was in the 19th	24 general, you are responsible for all the stuff a
	31	32
1	Sergeant does, because you are a Supervisor now for	1 A It's very general, pretty much what...
2	Sergeants.	2 Q Oh, and you did -- so your experience with
3	And you are what they would call a -- at	3 the 19th District was essentially from 2010 to 2014
4	the time, I don't think they use the phrase anymore --	4 with a break when you went to that 8th District,
5	a Watch Commander.	5 correct?
6	So you would be, like -- the next line	6 A Correct.
7	in supervision after a Sergeant. So you would actually	7 Q Then from 2014, where was your next
8	go to role call and disseminate information. And you	8 assignment?
9	wouldn't be in charge of the Watch.	9 A I -- I went to Gang Enforcement.
10	At the time I was a Lieutenant, they had	10 Q And so were you the Lieutenant in charge of
11	Captains on the Watch. So, basically, it would be a	11 Gang Enforcement?
12	Captain. And you would be -- you would fill in for him	12 A For Area North, correct.
13	on his days off, basically. You would assume his role.	13 Q And what districts comprised of Area North at
14	But you would go to role call. You	14 that time?
15	would, you know, speak with the Commander. You	15 A Yeah, because they just changed them
16	would -- you know, analyze crime problems with the	16 recently. Fifteen -- every -- it's -- it's a bunch of
17	Command Staff at a district level.	17 districts. So it was basically a third of the City,
18	You would approve arrest reports, things	18 15, 25, 16, 17, 19, 20, 24. I think I got all of them.
19	such as you were in charge of, you would have to go	19 Q And earlier you sort of described what your
20	into the lockup during your tour.	20 responsibilities were as Lieutenant sort of in -- for
21	And as a Watch Commander, you were	21 the 19th District. Was it generally the same for the
22	responsible for the physical location of the police	22 Lieutenant for Area North Gang Enforcement?
23	station also.	23 A Yes, much of it -- very much the same.
24	Q Okay.	24 Q I'm sorry. Was there anything particular

	33		34
1	that stands out that was distinctly different as	1	Q And what was your next assignment after that?
2	Lieutenant in charge of Area North Gang Enforcement?	2	A Oh, I was promoted to Captain. Or I should
3	A That we occasionally would get deployed,	3	say appointed to Captain. And I was at the 20th
4	which wouldn't happen in the district, not normally.	4	District.
5	You had an emergency, maybe a District would get	5	Q What were your responsibilities as a Captain?
6	deployed, but we would get deployed on occasion.	6	A Basically, to support the Commander, so --
7	Q And when you say deployed, I understand that	7	and -- I worked the opposite hours of a District
8	to mean sort of provide backups to other areas?	8	Commander. So, basically, to ensure that his policies
9	A Correct. And I mean -- to give an example,	9	were in effect -- to give more supervisions to the
10	we would go to Puerto Rican Fest for the duration and	10	Watches.
11	do traffic control and crowd control and stuff like	11	Q All right. When you are that high up, do you
12	that. I mean --	12	still have to look over paperwork?
13	Yes, so we were supplementing the	13	MS. STALF: Objection. Form. Foundation.
14	district when they had that festival. It's just -- you	14	MS. ADEEYO: Join.
15	know, when you say example, we were out there.	15	THE WITNESS: Could you repeat that? I'm
16	Q And how long were you with Area North Gang	16	sorry. Counsel, I caught some of it, not all of it.
17	Enforcement?	17	BY MS. SAMUELS:
18	A Estimate, a little more than -- maybe two	18	Q No, I said when you are that high of a rank,
19	years -- two and a half years.	19	do you still have to look over paperwork?
20	Q So some time around 2016; would you say?	20	A In what aspect? I mean, there's reports I
21	2016, --	21	have to do.
22	A Yeah.	22	Q So I guess, like, the reports that patrolmen
23	Q 2017?	23	or, like -- I think you said, like, as Sergeant, you
24	A 2016.	24	have to look over their reports, make sure they
	35		36
1	completed it.	1	BY MS. SAMUELS:
2	And as Lieutenant, made sure that the	2	Q Uh-huh.
3	Sergeant was -- like their stuff was correct, I guess.	3	A I did not do that, no.
4	Are you still doing that as a Captain, or is it more	4	Q And then how long were you with the 20th
5	like --	5	District as a Captain?
6	A It's a little bit --	6	A About four years -- four or more.
7	MS. STALF: Wait. Hold on. Objection.	7	Q Did you retire from the 20th District as a
8	I don't think that Counsel is done	8	Captain?
9	asking her question, first of all.	9	A Yes.
10	Were you finished, Jeanette?	10	Q Do you have an independent recollection of
11	MS. SAMUELS: My vague hand gesture over here	11	your role in the investigation into the murder of Merak
12	was like, was it more like higher level stuff.	12	Majdak?
13	(Indication.)	13	A Do I have a -- can you repeat that one more
14	MS. STALF: My objection is form, foundation	14	time? I'm sorry.
15	assumes facts not in evidence.	15	Q Yes. Do you have an independent recollection
16	Go ahead.	16	of your role into the murder of Merak Majdak -- of your
17	MS. ADEEYO: Join.	17	role in the investigation into the murder of Merak
18	THE WITNESS: So I see, basically, every	18	Majdak?
19	time -- kind of a rule of thumb -- every time you get	19	A I don't know what you're asking me. I mean,
20	promoted you have the duties you had before plus	20	could you be more specific? I --
21	the -- plus new responsibility.	21	Q Sure. So you understand that, essentially,
22	So I would do reports. I wouldn't	22	Merak Majdak was murdered on May 13, 2000, correct?
23	review individual reports, like a Sergeant. A Sergeant	23	A Correct.
24	would review individual reports and approve them.	24	Q Do you remember helping with that

	37		38
1      A    investigation at all?		1      in. I mean, I interviewed him with another Detective.	
2      A    I mean, I recall some of it, yes.		2      And he was charged with murder. I mean --	
3      Q    What do you recall doing to help with that		3      Q    And I guess -- so when you say, "I	
4      investigation?		4      interviewed him with another Detective," do you	
5      A    I was involved in the arrest of Jovanie Long.		5      remember, like, sitting in the room with him and	
6      Q    And what do you recall doing?		6      interviewing him?	
7      MS. STALF: Objection. Form.		7      A    Vaguely, yes.	
8      THE WITNESS: I mean, could you be more		8      Q    Okay. All right. So granted, this is 20	
9      specific?		9      years ago, but there's some parts of that interview	
10     BY MS. SAMUELS:		10     that you remember occurring; is that fair to say?	
11     Q    So just to sort of show -- tell you where my		11     A    You know, it's just a vague general memory,	
12     point of view is coming from as I'm asking these		12     yes.	
13     questions: I understand that there is, like, reams of		13     Q    Okay. And is that sort of the same when you	
14     paperwork about this, that may have helped you recall		14     say you remember the arrest of Jovanie Long?	
15     some things or that may tell you certain things		15     MS. STALF: Object to the form.	
16     happened on certain dates. Right.		16     MS. ADEEYO: Join.	
17                 All I want to know is, are there some		17     THE WITNESS: I mean, I remember he turned	
18     things that you are, like, I literally remember doing		18     himself in, I believe, with his mother and a reverend.	
19     this, as opposed to seeing it on a piece of paper?		19     But I mean, I don't recall freely the specifics, you	
20     Does that make sense?		20     know.	
21     A    Yes and no, because it's difficult --		21     BY MS. SAMUELS:	
22                 You know, as I sit here today it was 20		22     Q    So besides the fact that Jovanie turned	
23     something years ago. And I have reviewed some of my		23     himself in with his reverend and his mother, do you	
24     reports, so -- I mean, I was there when Jovanie came		24     recall anything else about that process?	
	39		40
1      A    What process? I mean, mane could you be more		1      learning that Jovanie was at Area 4?	
2      specific?		2      MS. ADEEYO: Objection. Asked and answered.	
3      Q    Sure. So how about this: Do you recall		3      THE WITNESS: I'd like to view my report to	
4      where Jovanie turned himself in?		4      refresh my memory if that's possible.	
5      A    Yes.		5      BY MS. SAMUELS:	
6      Q    All right. Where?		6      Q    Right. So we're going to go through all the	
7      A    At Area 4.		7      reports. And I'm sure by the time we are done with	
8      Q    All right. And do you recall where you were		8      them you are going to be a little bit mad at me because	
9      at the time that you learned Jovanie was at Area 4?		9      there's so many of them.	
10     A    I was at Area 4.		10                 But at this point, I just want to get	
11     Q    Do you recall how you were notified that		11     what you remember. And so if you don't recall, that's	
12     Jovanie was at Area 4?		12     fine, just say, "I don't recall." All I'm trying to	
13     A    I don't recall the specifics. I know it's in		13     get at is what you actually do remember.	
14     a report.		14     A    I understand. And I mean, I would feel more	
15     Q    You just know somewhere you were informed		15     comfortable reviewing my report.	
16     that Jovanie was at Area 4; is that fair to say?		16     Q    So -- right.	
17     A    That's fair to say.		17     A    If you want to ask me something specific,	
18     Q    Okay. And do you recall what you did after		18     I'll try to answer it, so --	
19     learning that Jovanie was at Area 4?		19     Q    Right. So my question is: After you learned	
20     A    Some of it. Not a lot of it. Not the -- you		20     that Jovanie had turned himself in, what's the next	
21     know, line by line; just a general memory. But		21     thing you recall doing?	
22     there's -- again, some of that's documented in the		22     MS. STALF: Objection. Form. Foundation.	
23     reports I reviewed.		23     THE WITNESS: Bringing him to an interview	
24     Q    And so what do you recall doing after		24     room.	

<p style="text-align: right;">41</p> <p>1 BY MS. SAMUELS:</p> <p>2 Q Were you alone with Jovanie at this time?</p> <p>3 MS. ADEEYO: Objection. Form.</p> <p>4 THE WITNESS: I -- I can't specifically</p> <p>5 recall.</p> <p>6 BY MS. SAMUELS:</p> <p>7 Q Do you recall where the interview room was?</p> <p>8 A It was in Area 4. I -- I'm...</p> <p>9 Q Do you recall any more specifically where</p> <p>10 that interview room was located in Area 4?</p> <p>11 A No. Sorry.</p> <p>12 Q Okay. When Jovanie was brought to the</p> <p>13 interview room, was he handcuffed?</p> <p>14 A I don't -- I don't recall something that</p> <p>15 specific.</p> <p>16 Q At the time that he is brought to the</p> <p>17 interview room, is he under arrest?</p> <p>18 MS. STALF: Objection. Form. Foundation.</p> <p>19 MS. ADEEYO: Join.</p> <p>20 THE WITNESS: I specifically don't recall. I</p> <p>21 believe it was probable cause to arrest him, but I</p> <p>22 don't know if he was placed immediately under arrest.</p> <p>23 I can't recall that.</p> <p>24 BY MS. SAMUELS:</p>	<p style="text-align: right;">42</p> <p>1 Q Do you recall what furniture was in the</p> <p>2 interview room?</p> <p>3 A No, Counsel. I'm sorry.</p> <p>4 Q Okay. So after Jovanie is placed in the</p> <p>5 interview room, what's the next thing you recall?</p> <p>6 MS. STALF: Objection. Form. Foundation.</p> <p>7 THE WITNESS: Again, when I was notified -- I</p> <p>8 mean -- I didn't specifically recall this, but it is</p> <p>9 indicated in my reports that I reviewed.</p> <p>10 BY MS. SAMUELS:</p> <p>11 Q Go ahead.</p> <p>12 MS. STALF: Were you done with your answer?</p> <p>13 THE WITNESS: Pardon me?</p> <p>14 MS. STALF: Were you done with your answer?</p> <p>15 THE WITNESS: Yes. Is that -- do you have</p> <p>16 another question? I'm sorry, Counsel.</p> <p>17 BY MS. SAMUELS:</p> <p>18 Q So when you said, I didn't specifically</p> <p>19 recall this, but it's in my reports, what were you</p> <p>20 referring to?</p> <p>21 A You are asking me questions about things that</p> <p>22 I documented or testified to. But you are asking me</p> <p>23 about my general recollection, which I don't want to</p> <p>24 make any mistakes. I want to be accurate.</p>
<p style="text-align: right;">43</p> <p>1 There's things I don't recall, that I</p> <p>2 don't want to make a statement that I may be later, you</p> <p>3 know, misstating something; you understand? I'm sorry.</p> <p>4 Q Right. No, I completely get all that. And</p> <p>5 so when you say you brought Jovanie to the interview</p> <p>6 room, is that something you read in a report, or</p> <p>7 something you remember?</p> <p>8 A Perhaps a little of both.</p> <p>9 Q Okay. After you brought Jovanie to the</p> <p>10 interview room, what is the next thing you recall about</p> <p>11 your interactions with him?</p> <p>12 A I believe we Mirandized him. I believe I</p> <p>13 did.</p> <p>14 Q Was somebody with you at the time; do you</p> <p>15 recall?</p> <p>16 A I don't recall, specifically, something like</p> <p>17 that that's, you know. I would have a better idea if I</p> <p>18 could, you know, refresh my memory.</p> <p>19 Q And then after mirandizing him, what's the</p> <p>20 next thing you recall occurring?</p> <p>21 MS. STALF: Objection. Form. Foundation.</p> <p>22 THE WITNESS: Are you asking me, in general,</p> <p>23 or -- we spoke with him?</p> <p>24 BY MS. SAMUELS:</p>	<p style="text-align: right;">44</p> <p>1 Q Okay. When you say "we," who are you</p> <p>2 referring to?</p> <p>3 A Detective Pietryla.</p> <p>4 Q Do you recall where you were when you spoke</p> <p>5 with him?</p> <p>6 A With -- with -- with who? Pietryla or -- I'm</p> <p>7 sorry. I'm confused.</p> <p>8 Q Right. You said "we spoke with him," which</p> <p>9 I'm inferring to mean you and Detective Pietryla are</p> <p>10 speaking with Jovanie long, correct?</p> <p>11 A Right.</p> <p>12 Q Do you recall where these conversations took</p> <p>13 -- where this conversation took place?</p> <p>14 MS. STALF: Objection. Form. Foundation.</p> <p>15 THE WITNESS: I believe in an interview room.</p> <p>16 BY MS. SAMUELS:</p> <p>17 Q Do you recall, with specificity, anything</p> <p>18 Jovanie Long said?</p> <p>19 A At this point -- I mean, at this day and age,</p> <p>20 no. I know that's indicated in the reports.</p> <p>21 Q Do you recall, generally, anything that</p> <p>22 Jovanie Long said?</p> <p>23 A Are you talking about throughout the whole</p> <p>24 interview process, or just -- I mean, could you please</p>

	45		46
1    be more specific or --		1    than once is if -- and this is general -- if I spoke to	
2       Q    Right. So -- from my recollection, you		2    him and left the room, or we spoke to him together and	
3    testified that the next thing you remember doing after		3    left the room, or whatever scenario.	
4    mirandizing him, is you and Detective Pietryla are		4       I mean, that is -- is what you are	
5    speaking to him. And so that's what I'm referring to.		5    getting at, that each time I spoke with him, or myself	
6              And so during this time, when you and		6    and Detective Pietryla spoke with him and left? That	
7    Detective Pietryla are speaking with Jovanie Long, do		7    would conclude -- that's why I would prefer to look at	
8    you generally recall anything that he's telling you?		8    my reports, because if I would give you --	
9       A    Not -- generally, no. At that time, no. I		9       I need better understanding, so --	
10   mean, are you talking about when we first interviewed		10      Q    Sure. So -- thank you for clarifying.	
11   him? I mean, that's -- I'm sorry.		11              When you -- would you consider an	
12      Q    Right. Yes, sir.		12   interview concluded at the time that you leave the room	
13      A    I'm mean, I'm kind of confused. I mean,		13   after you are done talking with a suspect?	
14   that's --		14      MS. STALF: Objection. Form. Foundation.	
15      Q    So do you recall interviewing Jovanie Long		15      MS. ADEEYO: Join.	
16   more than once?		16      THE WITNESS: It depends. It depends.	
17      A    I would have to say yes.		17   BY MS. SAMUELS:	
18      Q    How many times do you recall interviewing		18      Q    And what are some factors that would help	
19   Jovanie Long?		19   determine that?	
20      A    I don't recall a specific number.		20      A    Probably my reports. I can't recall, you	
21      Q    But whatever --		21   know, the minutia of things like that. I mean, my	
22      A    Can I clarify?		22   help -- my reports would help me, but --	
23      Q    Yes.		23      Q    Right. So right now, I'm talking about	
24      A    I mean, what I'm calling interviewed more		24   your -- sort of your general practice as a Detective,	
	47		48
1    right. So say you're questioning somebody over a		1       A    Plus, also, if you had to -- if I had to go	
2    period of 10 hours. Right.		2    to another location, or if I had other	
3              Would you consider the 10 hours, in and		3    responsibilities, if I spoke with, you know, a	
4    of itself to just be one long interview, or would you		4    Defendant in general.	
5    say I questioned him for an hour and then we took a		5       And maybe I had to go do some other duty	
6    break and then we came back a couple hours later, so		6    and not be there or whatever, I would -- I would	
7    that's two interviews?		7    consider that, you know, the interview was concluded	
8       MS. STALF: Objection. Form. Foundation.		8    while I did another task, yes, something in general	
9    Incomplete hypothetical.		9    like that.	
10      THE WITNESS: So you are asking me what my --		10      Q    Okay. And while we are on the topic, what --	
11   I believe a general policy is, not specific to this		11   you said prior to -- prior to become to sort of joining	
12   case, but just a general --		12   the Detective -- joining them, you received additional	
13   BY MS. SAMUELS:		13   training on some topics, correct?	
14      Q    Right.		14      MS. ADEEYO: Objection. Form.	
15      A    I wouldn't say, necessarily, every time you'd		15      THE WITNESS: Correct.	
16   leave the room, or if you took them for a bathroom		16      MS. STALF: Join.	
17   break or something, that you would consider an		17   BY MS. SAMUELS:	
18   interview concluded.		18      Q    One of them was interrogations?	
19              I mean, it's -- you know, it would be		19      A    Interviews. Is what it was called, I	
20   easier just to say that it's every time you are out the		20   believe. I'm not 100 percent certain. But, yes, I	
21   room. I mean, I don't recall specifically. General		21   believe.	
22   practice, it would be when your left the room, or your		22      Q    All right. Just so I know, is there -- is an	
23   conversation is concluded about a topic.		23   interview synonymous with interrogation, or are those	
24      Q    Okay.		24   two different things?	

<p style="text-align: right;">49</p> <p>1 MS. STALF: Objection. Form. Foundation.</p> <p>2 MS. ADEEYO: Join.</p> <p>3 THE WITNESS: An interview was more general,</p> <p>4 casual. An interrogation is more specific. So if</p> <p>5 somebody is in custody, that would be an interrogation.</p> <p>6 BY MS. SAMUELS:</p> <p>7 Q Is the training on how to conduct an</p> <p>8 interrogation different from how you would conduct an</p> <p>9 interview?</p> <p>10 MS. STALF: Objection. Form. Foundation.</p> <p>11 MS. ADEEYO: Join.</p> <p>12 THE WITNESS: I can't answer to specific</p> <p>13 training or -- general -- I mean, I understand there's</p> <p>14 a difference. I don't recall what I was trained in,</p> <p>15 you know, 20 something years ago, specifically.</p> <p>16 BY MS. SAMUELS:</p> <p>17 Q When you are conducting an -- when you are</p> <p>18 conducting -- I'm sorry.</p> <p>19 When you are conducting an interview,</p> <p>20 was it your general practice to take notes during the</p> <p>21 interview?</p> <p>22 MS. STALF: Objection. Form. Foundation.</p> <p>23 Vague as to timeframe.</p> <p>24 MS. ADEEYO: Join.</p>	<p style="text-align: right;">50</p> <p>1 THE WITNESS: It depends on the circumstance.</p> <p>2 BY MS. SAMUELS:</p> <p>3 Q And what circumstances might factor into</p> <p>4 whether or not you take notes?</p> <p>5 MS. STALF: Same objection.</p> <p>6 THE WITNESS: Well, I mean, there is -- it's</p> <p>7 a pretty broad -- you want a few examples, or something</p> <p>8 like that? I mean, mane if it's something pretty clear</p> <p>9 cut and you were going to document it on the case</p> <p>10 report, and it's a short timeframe, maybe you wouldn't</p> <p>11 take notes. Depending on what you are doing. You</p> <p>12 know, if you are speaking, your partner may take notes.</p> <p>13 And those or general practices, not something specific</p> <p>14 to the Walker or Long case. But, I mean -- so, I mean,</p> <p>15 there's a variety of -- I could sit here and try to</p> <p>16 recall -- those are just a couple simple ones right off</p> <p>17 the top of my head.</p> <p>18 MS. STALF: Jeanette, sorry to interrupt, but</p> <p>19 when it's a good time to take a quick comfort break,</p> <p>20 can you let us know?</p> <p>21 MS. SAMUELS: We can take one now.</p> <p>22 MS. STALF: We can go off for five minutes.</p> <p>23 (WHEREUPON, off the record.)</p> <p>24 MS. SAMUELS: Mr. Graham and Ms. Brill, are</p>
<p style="text-align: right;">51</p> <p>1 you guys here? Not -- Mr. Miller, excuse me.</p> <p>2 MR. MILLER: Yeah, I'm here.</p> <p>3 MS. SAMUELS: Ms. Brill?</p> <p>4 MR. OBERT: We can start.</p> <p>5 MS. SAMUELS: Back on the record.</p> <p>6 MS. STALF: Sorry. Before we get started,</p> <p>7 Madam Court Reporter, can we get a meeting password?</p> <p>8 We have another individual who is trying to join the</p> <p>9 deposition.</p> <p>10 MS. SAMUELS: Just send them the link.</p> <p>11 Off the record.</p> <p>12 (WHEREUPON, off the record.)</p> <p>13 MS. SAMUELS: So back on the record.</p> <p>14 BY MS. SAMUELS:</p> <p>15 Q Captain Riordan, did you have a chance to</p> <p>16 consult with your attorney over that break?</p> <p>17 MS. STALF: I'm just going to object to the</p> <p>18 form of the question to the extent it calls for</p> <p>19 attorney/client communication.</p> <p>20 But you can answer -- if you can answer</p> <p>21 the question without revealing attorney/client</p> <p>22 communication, you can answer it.</p> <p>23 THE WITNESS: Will you please repeat it? I'm</p> <p>24 sorry.</p>	<p style="text-align: right;">52</p> <p>1 BY MS. SAMUELS:</p> <p>2 Q Yes.</p> <p>3 Did you have a chance to consult with</p> <p>4 your attorney over the break?</p> <p>5 A Yes.</p> <p>6 Q Okay. When we left off, we were sort of</p> <p>7 talking your general practice with regards to</p> <p>8 interviews slash interrogatories; do you recall that?</p> <p>9 A Yes.</p> <p>10 Q Okay. And if I'm -- if my notes are close to</p> <p>11 accurate, you said it sort of depends on whether or not</p> <p>12 you would take notes during an interview or</p> <p>13 interrogation.</p> <p>14 And one of your examples were if you had</p> <p>15 a partner, and you were speaking, then maybe your</p> <p>16 partner would take notes, and not personally you.</p> <p>17 Or also if it was a short timeframe from</p> <p>18 the interview until the drafting of the case report</p> <p>19 that you might not need to take notes; is that fairly</p> <p>20 accurate?</p> <p>21 A Among other things, yes.</p> <p>22 Q Okay. When you are taking notes during an</p> <p>23 interview, are there certain things you are supposed to</p> <p>24 always record?</p>

	53		54
1	MS. STALF: Objection. Form. Foundation.	1	MS. STALF: Objection. Form. Foundation.
2	MS. ADEEYO: Join.	2	THE WITNESS: No.
3	THE WITNESS: Specifically, like I said, it	3	BY MS. SAMUELS:
4	would depend on the individual.	4	Q Why wouldn't you note an interviewee's name?
5	BY MS. SAMUELS:	5	MS. STALF: Same objection.
6	Q Okay. So I'm going to list some things. You	6	MS. ADEEYO: Join.
7	tell me if that's generally something that's supposed	7	THE WITNESS: It would depend on the subject
8	to be in a note you take for an interview slash	8	matter.
9	interrogation, okay?	9	BY MS. SAMUELS:
10	MS. STALF: Objection. Form. Foundation.	10	Q All right. So can you give me an example of
11	Incomplete hypothetical.	11	when you would interview someone but not record their
12	MS. ADEEYO: Join.	12	name?
13	THE WITNESS: Am I -- could you repeat that?	13	MS. STALF: Same objection.
14	I don't -- I'm sorry.	14	THE WITNESS: Answer?
15	BY MS. SAMUELS:	15	You want example. I get a license
16	Q I'm justing going to start naming some	16	plate, and I want to record -- note the specific
17	things, and I wanted you to tell me if that's something	17	numbers of it, but it --
18	that's supposed to be noted -- if something that you	18	I mean, notes are to assist your memory.
19	are supposed to take note of when recording about an	19	BY MS. SAMUELS:
20	interview or interrogation. Did that make sense?	20	Q Right. So I'm specifically talking about
21	A What I would do or -- no, it kind of don't.	21	when you are interviewing --
22	Q We'll see if it makes more sense. So if	22	So for these questions, I'm talking
23	you're taking notes for an interview, would you always	23	about when you're interviewing or interrogating
24	put down the interviewee's name?	24	someone. Right.
		55	56
1	A Correct.	1	will have to unmute yourself to do so.
2	Q And you've made a decision so that this	2	MR. PIETRYLA: Mike Pietryla.
3	interview interrogation, for whatever reason, requires	3	MS. SAMUELS: Okay.
4	you to take notes. Okay.	4	MS. STALF: Thank you, Mike. You can go
5	And so is there a time when you are	5	ahead and mute yourself again.
6	taking notes about an interview or an interrogation of	6	MR. PIETRYLA: Okay.
7	a person when you would not note that person's name?	7	BY MS. SAMUELS:
8	MS. STALF: Objection. Form. Foundation.	8	Q I think where we left off, if you were given
9	THE WITNESS: Is there -- yes.	9	an example of when, you would not memorialize an
10	BY MS. SAMUELS:	10	interviewee or, I guess, interrogationee's name -- I
11	Q And what's an example of a time when you are	11	don't think that's a word, but I tried it.
12	interviewing or interrogating somebody, and you would	12	A Could you be more specific? Memorialize is?
13	not memorialize that person's name?	13	Q To write down a report, somewhere their name.
14	MS. STALF: Objection.	14	A I'm sorry. I'm kind of lost in your
15	MS. ADEEYO: Join --	15	question. Could you repeat the question again?
16	I'll just put it on the record for ease	16	Q Sure. When you are taking notes over an
17	for the court reporter, I will, as attorney for	17	interview or an interrogation that's occurring, I asked
18	Defendant, City of Chicago, join all objections made by	18	whether you would always record somebody's name. And
19	Counsel for Defendant officers.	19	your response was no.
20	MS. SAMUELS: And then while we are pending,	20	And so I asked for an example of a time
21	I just let in, I believe it's one of the Defendants.	21	when you would interview or interrogate someone, but
22	But who is this for the record?	22	you wouldn't write down that person's name.
23	MS. STALF: Whomever just joined via phone,	23	MS. STALF: Objection just to the extent that
24	could you please identify yourself for the record? You	24	the question changed. But if it's a new question,

	57		58
1	sustained to the question as it was stated.	1	are to assist. So -- I mean, any time. If it's a
2	THE WITNESS: I may not spell out their name.	2	simple subject matter...
3	I may put an abbreviation, so I would remember who	3	BY MS. SAMUELS:
4	said --	4	Q So would it be fair to train -- would it be
5	If I'm speaking to one individual, is an	5	fair to state that pursuant to your training, as a
6	example.	6	Detective, whether or not to indicate the subject -- a
7	BY MS. SAMUELS:	7	subject's name was left to the discretion of the
8	Q Okay. So instead of writing out a full name,	8	interviewer?
9	you might use an initial or some other descriptor to	9	MS. STALF: Objection. Form. Foundation.
10	indicate who you are speaking to?	10	THE WITNESS: Can you repeat that? I'm
11	A On some occasions, yes.	11	sorry.
12	Q Okay. Is there ever an occasion when you are	12	BY MS. SAMUELS:
13	taking notes regarding an interview or an interrogation	13	Q Basically, what I'm trying to get at is: You
14	where you would not indicate anywhere who you are	14	were trained as a Detective on how to interview
15	speaking to?	15	suspects and take notes and write reports and all that
16	MS. STALF: Objection. Form. Foundation.	16	stuff, right?
17	THE WITNESS: I'm sure there's times, yes.	17	A Correct.
18	BY MS. SAMUELS:	18	Q And you're saying, sometimes we don't write
19	Q Okay. And can you give me an example of when	19	down a person's name or we don't indicate it anywhere
20	it would be appropriate to take notes regarding an	20	in our notes, correct?
21	interview or an interrogation and not memorialize who	21	MS. STALF: Objection. Form. Foundation.
22	is providing you with that information?	22	Mischaracterizes the witness' prior testimony.
23	MS. STALF: Objection. Form. Foundation.	23	THE WITNESS: On a note, you may not put
24	THE WITNESS: Any time. It's -- the notes	24	somebody's name; that's correct.
1	BY MS. SAMUELS:	59	
2	Q Right. And what I'm getting at is, pursuant		1 MS. ADEEYO: Objection. Form. Foundation.
3	to your training, that's okay because that's how you		2 Sorry. My apologies, Krista.
4	were trained to do it, correct?		3 Go ahead.
5	MS. STALF: Objection. Form. Foundation.		4 THE WITNESS: For notes, I generally used
6	THE WITNESS: I don't remember any specific		5 GPRs.
7	training regarding notes.		6 BY MS. SAMUELS:
8	BY MS. SAMUELS:		7 Q Okay. Are there are other forms that you
9	Q Okay. Were you trained on how to memorialize		8 would use to document the statement?
10	a witness' statement?		9 MS. STALF: Objection. Form. Foundation.
11	MS. STALF: Objection. Form. Foundation.		10 THE WITNESS: It depends on the
12	THE WITNESS: I don't recall.		11 circumstances.
13	BY MS. SAMUELS:		12 BY MS. SAMUELS:
14	Q And when you take notes from talking with a		13 Q Can you identify the form? And then we'll go
15	witness, you -- I believe you said earlier, but I just		14 through and we'll talk about what circumstances we'll
16	want to make sure I'm not making this up.		15 use those for.
17	When you take notes from talking with a		16 A It's a very broad topic. It could be
18	witness, those go on general progress reports, correct?		17 anything I could write on that's relevant to the case,
19	A That's what a general progress report is, is		18 or it would have -- you know, basically, anything I
20	for notes. But that's not the only form you could		19 could write on, Counsel.
21	document information on.		20 Q Sure. Are there any specific forms that
22	Q Okay. What are other forms you would use to		21 you're supposed to use to document the statement that's
23	document a statement a witness is giving to you?		22 given by a witness?
24	MS. STALF: Objection to form --		23 A There's -- there's a few forms, yes.
			24 Q What are they?

	61		62
1        A    Well, normally, a general progress report and		1        BY MS. SAMUELS:	
2    your case report and supplemental case reports.		2        Q    What about when you're speaking with a	
3        Q    And case reports and supplemental case		3    witness, are you supposed to document that witness'	
4    reports are typed, correct?		4    phone number?	
5        MS. STALF: Objection. Form. Foundation.		5        MS. STALF: Objection. Form. Foundation.	
6        THE WITNESS: For the most part, yes. They		6        THE WITNESS: Yes.	
7    can be handwritten also, but not in this -- what do I		7    BY MS. SAMUELS:	
8    want to say.		8        Q    When you are talking with a witness, are you	
9              There are versions of the supplemental		9    supposed to take down a date of birth?	
10   and case report that could be handwritten.		10        MS. STALF: Objection. Form. Foundation.	
11   BY MS. SAMUELS:		11        THE WITNESS: Again, if they will provide it,	
12        Q    Right. Besides a GPR case report and a		12    yes.	
13   supplemental case report, are there any other specific		13   BY MS. SAMUELS:	
14   forms that you are aware of that would be used to		14        Q    When you are speaking with the witness, are	
15   document a statement given by a witness?		15    you supposed to take down any employment history?	
16        MS. STALF: Objection. Form. Foundation.		16        MS. STALF: Objection. Form. Foundation.	
17        THE WITNESS: No.		17        THE WITNESS: Again, if they will provide it,	
18   BY MS. SAMUELS:		18    yes.	
19        Q    Okay. When you are talking with a witness,		19   BY MS. SAMUELS:	
20   are there times when you're not -- are you always		20        Q    When you are talking with the witness, are	
21   supposed to put that witness' address?		21    you supposed to document where this discussion is	
22        MS. STALF: Objection. Form. Foundation.		22    taking place?	
23        THE WITNESS: When you -- if they will give		23        MS. STALF: Same objection.	
24   it to you.		24        THE WITNESS: I would say that's fair, yes.	
	63		64
1    BY MS. SAMUELS:		1    time.	
2        Q    When you're talking with a witness, are you		2        Q    I just wanted to make sure you knew what I	
3    supposed to document when the discussion is taking		3    meant when I said "course of interrogation."	
4    place?		4        A    Could you explain? I'm sorry.	
5        MS. STALF: Same objection.		5        Q    So were you ever trained that there were	
6        THE WITNESS: Yes.		6    certain techniques or tactics that shouldn't be used	
7    BY MS. SAMUELS:		7    because it might lead to a witness just saying	
8        Q    Okay. And then -- again, I believe we		8    something because they were in fear and not necessarily	
9    touched on this briefly. But I just want to make sure		9    because they wanted to freely give that information?	
10   I didn't miss it.		10        MS. STALF: Objection. Form. Foundation.	
11        Were you ever trained, specifically, on		11        THE WITNESS: I don't recall. I know I had	
12   how to conduct an interview or an interrogation?		12    training. I don't recall specifics of that training.	
13        A    Yes, but I don't recall when.		13   BY MS. SAMUELS:	
14        Q    Okay. Were you ever trained on how to make		14        Q    All right. Were you ever trained on	
15   sure an interview or interrogation doesn't become		15    polygraph examinations?	
16   coercive?		16        MS. STALF: Objection. Form. Foundation.	
17        MS. STALF: Objection. Form. Foundation.		17        THE WITNESS: No.	
18        THE WITNESS: I don't remember specifically.		18   BY MS. SAMUELS:	
19   BY MS. SAMUELS:		19        Q    All right. Were you ever given any	
20        Q    All right. Do you get what I'm referring to		20    instruction on when it's appropriate to request a	
21   when I say "a course in interrogation"?		21    polygraph examination?	
22        A    A course of interrogation?		22        MS. ADEEYOO: Objection. Form. Foundation.	
23        Q    Yeah.		23        MS. STALF: Join.	
24        A    Could you repeat that? I'm sorry. One more		24        THE WITNESS: No.	

<p style="text-align: right;">65</p> <p>1 BY MS. SAMUELS:</p> <p>2 Q In your experience, as a Police Officer, did 3 you ever develop a general practice with regard to when 4 to request a polygraph examination?</p> <p>5 MS. STALF: Objection. Form. Foundation.</p> <p>6 THE WITNESS: I'm sorry. Could you 7 repeat that one? I missed like one or two words there.</p> <p>8 BY MS. SAMUELS:</p> <p>9 Q I gotcha.</p> <p>10 In your experience as a Police Officer, 11 did you ever develop a general practice with regard to 12 requesting a polygraph examination?</p> <p>13 A No.</p> <p>14 Q So if somebody requested a polygraph 15 examination, would you always request one?</p> <p>16 MS. STALF: Objection. Form. Foundation.</p> <p>17 THE WITNESS: Probably yes.</p> <p>18 BY MS. SAMUELS:</p> <p>19 Q Okay. Were there ever times where you 20 independently believed that a polygraph 21 investigation -- excuse me -- that a polygraph test 22 would further an investigation?</p> <p>23 MS. STALF: Objection. Form. Foundation.</p> <p>24 THE WITNESS: Yes.</p>	<p style="text-align: right;">66</p> <p>1 BY MS. SAMUELS:</p> <p>2 Q What were some factors that would lead you to 3 believe that a polygraph would help further an 4 investigation?</p> <p>5 MS. ADEEYOO: Objection. Form. Foundation.</p> <p>6 THE WITNESS: Could you repeat that one 7 more --</p> <p>8 BY MS. SAMUELS:</p> <p>9 Q Sure. So what were some factors you might 10 look to that would lead you to believe that a polygraph 11 would help further an investigation?</p> <p>12 A When there's an impasse and the subject would 13 request to prove his innocence or to prove himself 14 being trustworthy.</p> <p>15 Q Did you have a general practice that you 16 developed over your years as a Police Officer to help 17 identify when an interview or interrogation might be 18 coming coercive?</p> <p>19 MS. STALF: Objection. Form. Foundation.</p> <p>20 Incomplete hypothetical.</p> <p>21 THE WITNESS: I'm sorry -- I'm really sorry. 22 Can you repeat that?</p> <p>23 BY MS. SAMUELS:</p> <p>24 Q Sure. Did you have a general practice you</p>
<p style="text-align: right;">67</p> <p>1 developed over the years as a Police Officer to help 2 you identify when an interview or an interrogation 3 might be coming coercive?</p> <p>4 A Not that I recall.</p> <p>5 Q Have you ever worked with confidential 6 informants during your time as a Police Officer?</p> <p>7 A I can't recall specifically.</p> <p>8 Q Did you ever receive any training or guidance 9 on how to work with confidential informants?</p> <p>10 MS. STALF: Objection. Form. Foundation.</p> <p>11 THE WITNESS: I believe so, yes.</p> <p>12 BY MS. SAMUELS:</p> <p>13 Q Okay. Was there a procedure for -- I 14 don't -- was there a procedure for maintaining a 15 confidential informant?</p> <p>16 MS. STALF: Objection. Form. Foundation.</p> <p>17 THE WITNESS: There are some general 18 procedures, but I don't recall them offhand.</p> <p>19 BY MS. SAMUELS:</p> <p>20 Q Can you relay the ones that you do recall?</p> <p>21 MS. STALF: Objection. Form. Foundation.</p> <p>22 THE WITNESS: Not really, no.</p> <p>23 BY MS. SAMUELS:</p> <p>24 Q So as you sit here today, you don't recall</p>	<p style="text-align: right;">68</p> <p>1 any procedures that would have to do with a 2 confidential informant?</p> <p>3 MS. STALF: Objection. Form. Foundation.</p> <p>4 THE WITNESS: I know it depends -- I mean -- 5 For, like, search warrants, things like 6 that, there are some guidelines. I recall those.</p> <p>7 BY MS. SAMUELS:</p> <p>8 Q Can you re -- I was doing so good.</p> <p>9 A But I wouldn't call that all-encompassing.</p> <p>10 Q Okay. Can you describe what you recall for 11 how to deal with confidential informants?</p> <p>12 MS. STALF: Objection. Form. Foundation.</p> <p>13 Asked and answered.</p> <p>14 THE WITNESS: For search warrants, there 15 was -- I recall a specific guideline for confidential 16 informants.</p> <p>17 BY MS. SAMUELS:</p> <p>18 Q Can you describe what you recall about that 19 guideline?</p> <p>20 A Basically, that you had to have at least 21 three prior dealings with the subject and that he had 22 to provide credible evidence prior to you using him as 23 an affiant on a search warrant.</p> <p>24 Q If you wanted to make somebody a confidential</p>

	69		70
1	informant, do you have to give any approval?	1	the wrong tree?
2	MS. STALF: Objection. Form. Foundation.	2	MS. STALF: Object to form.
3	THE WITNESS: I don't believe so.	3	THE WITNESS: You are correct.
4	BY MS. SAMUELS:	4	BY MS. SAMUELS:
5	Q If you wanted to make somebody a confidential	5	Q Okay. And so, essentially, you are not
6	informant, is there any way you have to record that	6	trained, perhaps, as specifically as an evidence
7	informant's personal information?	7	technician, but you are taught the basics of preserving
8	MS. STALF: Objection. Form. Foundation.	8	a scene and evidence and things like that?
9	THE WITNESS: Not that I recall.	9	A Correct.
10	BY MS. SAMUELS:	10	MS. ADEEYO: Objection.
11	Q So if, for instance, I'm reading a report and	11	THE WITNESS: Sorry.
12	it says, "Confidential Informant," naming X, Y and Z,	12	BY MS. SAMUELS:
13	is there any mechanism, that you are aware of, to go	13	Q Okay. As you sit here today, do you have an
14	back and check who -- the identity of that confidential	14	independent recollection of anything Jovanie told you
15	informant?	15	during the course of your time questioning him?
16	MS. STALF: Objection. Form. Foundation.	16	MS. STALF: Objection. Form. Foundation.
17	THE WITNESS: I don't believe so.	17	THE WITNESS: Specific, no.
18	BY MS. SAMUELS:	18	BY MS. SAMUELS:
19	Q And I believe the -- one of the other things	19	Q Okay. Do you recall, generally, anything he
20	you mentioned you were trained on to become a Detective	20	said?
21	was preserving evidence; is that correct?	21	MS. STALF: Same objection.
22	A Correct.	22	THE WITNESS: Generally? That he shot the
23	Q Okay. When you say 'preserving evidence,' do	23	guy.
24	you mean, like, crime scene stuff, or am I barking up	24	BY MS. SAMUELS:
71			72
1	Q Okay. Do you recall how long you had been	1	MS. STALF: Objection. Form. Foundation.
2	talking with Jovanie before he said that?	2	THE WITNESS: Yes.
3	A No, I don't.	3	BY MS. SAMUELS:
4	Q Okay. Is there an -- so I know -- well, I	4	Q All right. Where does the money come to
5	think I know. Let me ask you: When a person is taken	5	buy -- to purchase their food?
6	into lock-up, is there a log that records the time that	6	MS. STALF: Same objection.
7	they are brought in?	7	THE WITNESS: Some of it is in the area.
8	A Yes.	8	Some of it, we buy ourselves.
9	Q Okay. When a person is brought in for an	9	BY MS. SAMUELS:
10	interview, is there some sort of similar log that	10	Q When you say yourself, you mean out of your
11	indicates the time they are brought in?	11	own pocket?
12	MS. STALF: Objection. Form. Foundation.	12	A Correct. Correct, Counsel.
13	THE WITNESS: Can you repeat that? I'm	13	Q All right. Is it always out of your own
14	sorry.	14	pocket, or is there some other mechanism or method for
15	BY MS. SAMUELS:	15	obtaining them food?
16	Q Yeah. When a person is brought in for an	16	MS. STALF: Objection. Form. Foundation.
17	interview, is there a similar sort of log that	17	THE WITNESS: Probably primarily out of your
18	indicates the time that they are brought in?	18	pocket.
19	MS. STALF: Objection. Form. Foundation.	19	BY MS. SAMUELS:
20	THE WITNESS: Not that I recall.	20	Q Is there a mechanism or method to obtain
21	BY MS. SAMUELS:	21	reimbursement for purchasing an interviewee or a
22	Q Okay. When a person has been brought in for	22	detainee food?
23	questioning for a while sometimes you will buy them	23	MS. STALF: Objection. Form. Foundation.
24	food; is that correct?	24	THE WITNESS: Not that I'm aware of.

<p style="text-align: right;">73</p> <p>1 BY MS. SAMUELS:</p> <p>2 Q Do you recall, specifically, anything that 3 you told Jovanie during the course of your interview 4 with him?</p> <p>5 MS. ADEEYOO: Object to asked and answered.</p> <p>6 THE WITNESS: No, I'm sorry. I don't -- I 7 don't recall.</p> <p>8 BY MS. SAMUELS:</p> <p>9 Q Do you recall, generally, anything you told 10 Jovanie during the course of your interview with him?</p> <p>11 MS. ADEEYOO: Same objection.</p> <p>12 THE WITNESS: No, I don't.</p> <p>13 BY MS. SAMUELS:</p> <p>14 Q Do you recall, with any specificity 15 anything -- I don't want to pronounce it wrong, 16 especially, if he -- is it Pietryla?</p> <p>17 MS. STALF: Pietryla.</p> <p>18 THE WITNESS: Pietryla.</p> <p>19 MS. SAMUELS: I'm sorry. Say that again.</p> <p>20 THE WITNESS: Pietryla.</p> <p>21 BY MS. SAMUELS:</p> <p>22 Q Do you recall specifically anything Detective 23 Pietryla said during the course of the interview with 24 Jovanie?</p>	<p style="text-align: right;">74</p> <p>1 MS. STALF: Objection. Form. Foundation.</p> <p>2 THE WITNESS: No, I don't recall.</p> <p>3 BY MS. SAMUELS:</p> <p>4 Q Do you recall specifically anything Detective 5 Pietryla said during the course of the interrogation?</p> <p>6 MS. STALF: Same objection.</p> <p>7 THE WITNESS: No, I don't. Sorry, Counsel.</p> <p>8 BY MS. SAMUELS:</p> <p>9 Q Do you recall Jovanie's demeanor during the 10 course of the interrogation?</p> <p>11 MS. STALF: Same objection.</p> <p>12 THE WITNESS: I can't. I don't recall 13 anything unusual about it.</p> <p>14 BY MS. SAMUELS:</p> <p>15 Q Do you recall anything about Jovanie's 16 physical condition?</p> <p>17 MS. STALF: Objection. Form. Foundation.</p> <p>18 THE WITNESS: Basically, again, nothing that 19 was unusual.</p> <p>20 BY MS. SAMUELS:</p> <p>21 Q Do you recall what he was wearing?</p> <p>22 A No. Sorry.</p> <p>23 Q Do you recall whether you had to remove any 24 personal property from him before putting him in the</p>
<p style="text-align: right;">75</p> <p>1 interview room?</p> <p>2 MS. STALF: Objection. Form. Foundation.</p> <p>3 THE WITNESS: No, I don't recall that.</p> <p>4 BY MS. SAMUELS:</p> <p>5 Q Besides what you've already testified to, is 6 there anything else you specifically recall about any 7 of your interactions with Jovanie long?</p> <p>8 A Yes.</p> <p>9 Q All right. What is that?</p> <p>10 A He gave a videotaped statement.</p> <p>11 Q All right. And were you present for the 12 statement?</p> <p>13 A Yes.</p> <p>14 Q When is the last time you saw that video?</p> <p>15 MS. STALF: Objection. Form. Foundation.</p> <p>16 Facts not in evidence.</p> <p>17 THE WITNESS: A long time -- I mean, I may 18 have viewed it in some court proceedings years ago. 19 I'm not 100 percent sure.</p> <p>20 BY MS. SAMUELS:</p> <p>21 Q It's fair to say you haven't seen it within 22 the last decade?</p> <p>23 A Or more, correct.</p> <p>24 Q All right. Besides -- is there anything else</p>	<p style="text-align: right;">76</p> <p>1 you specifically recall about your interactions with 2 Jovanie Long?</p> <p>3 A Is that his -- just that his mother an 4 reverend turned him in. And I mean, we spoke with 5 them, and that's basically what I recall.</p> <p>6 Q Do you recall speaking with his mother at any 7 date prior to him being turned in?</p> <p>8 MS. STALF: I'm sorry. Can you restate that 9 question, Counsel? I didn't hear that.</p> <p>10 BY MS. SAMUELS:</p> <p>11 Q Do you recall speaking with his mother at any 12 date prior to him being turned in?</p> <p>13 MS. STALF: Thank you.</p> <p>14 THE WITNESS: I don't recall specifically 15 speaking to her, but one way or another, I was present 16 when -- I think we spoke to her one time.</p> <p>17 BY MS. SAMUELS:</p> <p>18 Q All right. Do you recall that, or you just 19 read that in a report?</p> <p>20 A I vaguely recall speaking with her one time.</p> <p>21 Q All right. Was that over the phone or in 22 person?</p> <p>23 A I believe in person.</p> <p>24 Q Do you recall who else was with you?</p>

	77		78
1        A    I believe Pietryla, but I don't recall if		1        himself in, you have a specific recollection of meeting	
2    there were other people or not.		2    her one other time and at least Detective Pietryla was	
3        Q    Do you recall where this meeting took place?		3    there with you; is that fair?	
4        A    I -- somewhere else outside.		4        A    That's fair.	
5        Q    Do you mean, like --		5        Q    Okay. You are not sure where that location	
6        A    Maybe -- like on her block, or -- I mean.		6    is, but from the reports, the most likely location is	
7        Q    So to the best of your recollection -- how		7    her residence; is that fair?	
8    can I say this without sounding abstruse?		8        A    That's fair.	
9              You didn't meet with her -- so to the		9        Q    Okay. Do you have any specific recollections	
10   best of your recollection, you did not meet with		10   with regard to your role in this -- in the	
11   Jovanie Long's mother inside of any building; is that		11   investigation into the murder of Merak Majdak?	
12   fair to say?		12        A    I'm sorry. I lost like a couple words.	
13        A    No, I may have spoken to her at her		13   Would you please repeat?	
14   residence, but I -- it's -- it should be documented in		14        Q    Yes, sir. Do you have -- do you have any	
15   a report.		15   other specific recollection of your role -- or -- of	
16        Q    As you sit here today, do you recall meeting		16   what you did to investigate the murder of Merak Majdak?	
17   with Jovanie Long's mother at her residence?		17        A    Not that I recall, no.	
18        A    Specifically, her residence, I don't recall.		18        Q    Okay. Do you recall the location of where	
19   But I know that there's a report that has information.		19   the body was found?	
20              So I recall meeting with her, but I		20        MS. ADEEYO: Object to form.	
21   didn't remember, specifically, what address or what --		21        THE WITNESS: I recall an address.	
22   so --		22   BY MS. SAMUELS:	
23        Q    So let me just make sure I'm -- so prior to		23        Q    Were you -- was this investigation -- was	
24   meeting her at the police station when Jovanie turns		24   this a gang investigation?	
	79		80
1        MS. STALF: Objection. Form. Foundation.		1        MS. SAMUELS: All right.	
2              THE WITNESS: No.		2        MS. STALF: Can we go off the record?	
3   BY MS. SAMUELS:		3        MS. SAMUELS: Yep.	
4        Q    Okay. Do you know what gang was, I guess, in		4              (WHEREUPON, off the record.)	
5   charge of that location where the body was found?		5        MS. SAMUELS: Okay. So back on the record.	
6        MS. STALF: Objection. Form. Foundation.		6   BY MS. SAMUELS:	
7              THE WITNESS: I may have at the time. I		7        Q    When we left off, I was asking you about your	
8   don't recall now.		8   independent recollections regarding what you did during	
9   BY MS. SAMUELS:		9   the course of the investigation into Merak Majdak; do	
10        Q    Gotcha. All right.		10   you recall that?	
11        MS. SAMUELS: I'm about to just run through		11        A    Yes.	
12   about five GPRs and basically every case incident		12        Q    Okay. And, essentially, there were -- let's	
13   report. And so I don't know if you guys wanted to take		13   call it three main areas that you remembered -- you	
14   a break, or just power through that.		14   remember speaking with his mother at some point before	
15        MS. STALF: Do you want to take a lunch break		15   he turned himself in; is that correct?	
16   or do you want to keep going?		16        A    Correct.	
17        THE WITNESS: I'll take a lunch break; is		17        Q    You remembered him turning himself in along	
18   that all right?		18   with his mother and his pastor, correct?	
19        MS. SAMUELS: Yes, that's fine.		19        A    Correct.	
20        MS. STALF: Like 35 minutes; is that okay?		20        Q    And then the third thing you remembered	
21        MS. SAMUELS: Yeah, so come back at what?		21   was -- well, let's call it four things you remembered.	
22        MS. STALF: 12:50.		22              The third thing, you remembered was the	
23        MS. SAMUELS: 12:50. Okay.		23   interrogation with Officer Pietryla, correct?	
24        MS. STALF: Yeah, that work.		24        A    Detective Pietryla, yes.	

	81		82
1       Q     Oh, I'm sorry. Detective Pietryla.		1     Progress Report?	
2                  And then you also remembered that he		2                  MS. STALF: Yeah, we'll need that enlarged	
3     gave a videotaped statement?		3     significantly, Jeanette. It's pretty tiny.	
4       A     Correct.		4                  MS. SAMUELS: Is this better?	
5       Q     Is there anything else regarding your role		5                  MS. STALF: Yeah, and I'm actually going to	
6     into the investigation of Merak Majdak that you recall?		6     turn my laptop so that the witness can see my screen,	
7                  MS. STALF: Objection. Asked and answered.		7     because the screen he's using is quite far away.	
8                  THE WITNESS: Testifying in court.		8                  MS. SAMUELS: Okay.	
9     BY MS. SAMUELS:		9     BY MS. SAMUELS:	
10      Q     All right. But nothing during the course of		10     Q     Can you see this?	
11     the investigation, correct?		11     A     I can see it. It's difficult to read.	
12      A     Correct.		12     Q     All right. And so I'm showing you what's	
13      Q     Okay. Now, when you joined, I guess, the		13     been marked as City NK146. Are you able to read this	
14     investigation, it was already ongoing; is that fair to		14     handwriting?	
15     say?		15     A     I mean, I can make out some of it.	
16      A     Yes.		16     Q     To the best you can, can you just tell me	
17      Q     Okay. Do you recall what actions you took to		17     what it says?	
18     get up to speed with the investigation?		18     A     Is that B? I can't read the -- it says Arson	
19                  MS. STALF: Objection. Form. Foundation.		19     or Arason, or -- I can't -- is that B? 405 North	
20                  THE WITNESS: Probably read some reports and		20     Mason, first floor. It was with grandma. Phone, (773)	
21     spoke with the Detective assigned to it.		21     I think, 809-4543, unemployed.	
22     BY MS. SAMUELS:		22                  I don't know what the next word is. And	
23      Q     And then -- I'm sharing my screen. And I		23     I don't know -- I think the one word is prostitute.	
24     don't know if -- can you see? It looks like a General		24     And then I don't know what those initials are. And	
	83		84
1     50275.		1     on worsen, voluntarily." It looks like, "K03" or	
2                  Do you want me to continue reading or --		2     "Paul," misspelled.	
3      Q     Yeah. And that was pretty -- like, the first		3                  I -- "into the call to" -- it looks	
4     paragraph or so, correct?		4     like, "tells to us," but it's probably "talked to us."	
5      A     Yes.		5     It's "s-i-t-j-o-c-y." I -- I can't read the word. I	
6                  MS. STALF: I just want to insert my		6     can't read this next word, "Patrons."	
7     objection to this witness translating what's written in		7                  And I can't read that next word. It	
8     this report, if it hasn't been established that this		8     looks like "C-Q, something. I see "A slash 4," which	
9     individual authored this report, nor has it been		9     would be Area 4. And "PO", and I can't read the names.	
10    established that he knows who authored the report, and		10     It looks like an "s-o-r-u --	
11    he's indicated that he can't read most of the writing.		11     s-o-l-d-u-s-d-i," maybe a "y-a-t-n." I believe that's	
12    With that being said, if you still want him		12     the word "understood." I can't make out the next word.	
13    to do it...		13     "To talk with PRDs -- "talk with," it's either "P" or	
14    MS. SAMUELS: Yes.		14     "RDs" -- I know it's a "D." I'm not sure what the	
15    THE WITNESS: Out loud, or --		15     syllable is before.	
16    MS. STALF: Yeah, out loud. You want him to		16     BY MS. SAMUELS:	
17    read it out loud, right?		17     Q     That was the second paragraph, essentially,	
18    MS. SAMUELS: Yes. Please.		18     correct?	
19    THE WITNESS: "Sergeant Howdy" or --		19     A     Yes.	
20    "assigned to," I believe, "interview." That's a guess.		20     Q     All right. Go ahead with the third	
21    And then "S-a-n-m-o-t," which doesn't make sense to me,		21     paragraph.	
22    "Wright, W-r-i-g-h-t."		22     A     "States D" -- I don't know what -- "2M1" -- I	
23                  And then I can't read that word. It's		23     can't make out that next word. I can't make out that	
24    like "pick" or "picked -- "picked up states. She was		24     next word. "Shot" -- I don't know if it's "un" --	

	85		86	
1	"into a White boy on Ohio over drugs."	1	you need me to Zoom in?	
2	"So do sig(phnetic) knows" -- I can't	2	A Probably Zoom in.	
3	read that last name. "Know police, R-o-u-s-t" -- I	3	Q Okay. And so a Case Supplementary Report,	
4	can't make out that other word.	4	like the type that you are viewing, can that be	
5	Got to pull it little closer.	5	completed by hand, or is this completed on computer?	
6	MS. STALF: Yeah.	6	MS. STALF: Objection. Form. Foundation.	
7	THE WITNESS: "Doesn't know of" -- I can't	7	THE WITNESS: Computer.	
8	read that word, "human." It looks like "DIP on" -- so	8	BY MS. SAMUELS:	
9	I'm in the next paragraph. I don't know what that	9	Q Okay. And my understanding is Chicago Police	
10	first word is, "to Donney Howl, 20716."	10	Department vehicles are equipped with computers inside	
11	I can't read that next word, "no	11	them; is that correct?	
12	description. Knowledge of." I don't know what that	12	MS. STALF: Objection. Form. Foundation.	
13	word is. And "2100 hours," that's the only other thing	13	THE WITNESS: Now? Yes.	
14	I can make out.	14	BY MS. SAMUELS:	
15	BY MS. SAMUELS:	15	Q Okay. Is it fair to say you are not sure	
16	Q All right. Thank you very much, sir.	16	whether or not in 2000 the police cars had computers in	
17	I shared a second screen, and it -- that	17	them?	
18	capture saying, "Chicago Police Department Case	18	A They could do these functions, yes.	
19	Supplementary Report;" can you see that?	19	Q Okay. That was going to be my question.	
20	A Yes.	20	Okay.	
21	Q All right. And it looks like this first	21	Is this one of the reports that you	
22	report is a three-page document, Bates Stamped City	22	mentioned that you would have reviewed?	
23	NK283 to 285.	23	MS. STALF: Objection. Form. Foundation.	
24	Is it easier if I do full page, or do	24	THE WITNESS: I -- could you go back to the	
1	top?	87	88	
2	BY MS. SAMUELS:		1	like Merak Majdak?
3	Q Yes, sir.		2	A That's probably what's confusing me is the
4	A So -- I'm trying to see what -- could you		3	last name. It's combined.
5	drag it down?		4	Q Gotcha. What I wanted to ask you -- and let
6	Q Let me know if I'm going too fast or too		5	me know if you don't know any of this information --
7	slow.		6	is I'm trying to figure out what -- the questions that
8	A All right. Is that pretty much it?		7	I'm going to be asking --
9	Q That's the first page, yeah.		8	I'm going to be asking you about what
10	A All right.		9	part is automatically entered, if you know, or what
11	Q And so let me ask a better question:		10	part are police officers?
12	Is this the case supplementary report		11	A What parts are automatically entered?
13	related to the investigation into the murder of Merak		12	Q Yeah. So like -- so when it says, "Report
14	Majdak?		13	Created By," is that something that is automatically in
15	A I don't recall. But I would have to -- I		14	the report because you put in your Star Number or
16	don't know the RD number to the case to identify it.		15	something, or do you, like, literally write, like I'm
17	Q Okay. Do you see this second box where it		16	the person writing this report; do you get what I'm
18	says, "Victim slash Complainant slash Witness slash		17	saying?
19	Subject"?		18	MS. STALF: Objection. Form. Foundation.
20	A Yes.		19	THE WITNESS: I mean, currently, that's how
21	Q Okay. And do you see where it says "Role		20	it works. I don't recall if that's exactly how it
22	Victim"?		21	worked back in 2000.
23	A Yes.		22	I know that it does that now. But I
24	Q And it says name, Merak. And then it looks		23	don't recall if it worked that way back in 2000.
			24	BY MS. SAMUELS:

	89		90
1       Q   Understood. Do you know what a Case Report		1   cursor when I move it, when I'm indicating or not?	
2   ID is?		2       A   Yes -- yes, I can.	
3       A   I know what a RD number is. Case Report ID,		3       Q   Oh, okay. So when it says, "Date RO	
4   I don't recall what it is.		4   arrived;" do you recall if that's something that's	
5   BY MS. SAMUELS:		5   automatically populated, or something that the RO would	
6       Q   Okay. Can one RD number have multiple case		6   put?	
7   reports under it?		7           MS. STALF: Objection. Form. Foundation.	
8       MS. STALF: Objection. Form. Foundation.		8           THE WITNESS: That would be something on a	
9       THE WITNESS: Generally speaking, one case		9   case report that you would have to enter.	
10   report would have one RD. But you could put several		10   BY MS. SAMUELS:	
11   RDs in an area or in other boxes of a case report.		11       Q   Okay. Do you know what a supplement -- I'm	
12   So...		12   guessing "SUP period" stands for "supplement ID"?	
13   BY MS. SAMUELS:		13       A   Supplementary.	
14       Q   And so is the RD number something that the		14       Q   Okay?	
15   officer would put in or something that's already there?		15       A   Would you please repeat that? I'm sorry.	
16       MS. STALF: Objection. Form. Foundation.		16       Q   Yeah. Do you know what Supplementary ID	
17       THE WITNESS: It depends, again. I'm		17   stands for, what that number is indicating?	
18   trying -- both, and depending on the circumstances.		18           MS. STALF: Objection. Form. Foundation.	
19   BY MS. SAMUELS:		19           THE WITNESS: I -- I'm trying to find it. I	
20       Q   Okay. What about when it says -- can you see		20   mean, it's probably an electronic identification for	
21   this little, like, bulls eye looking thingy as I move		21   this particular supplementary report.	
22   it?		22   BY MS. SAMUELS:	
23       A   I'm sorry --		23       Q   Do you know what "Event Number" is referring	
24       Q   I was just wondering if you can see the		24   to?	
	91		92
1       MS. STALF: Objection. Form. Foundation.		1   it's linking to the original case report?	
2       THE WITNESS: An Event Number is generated		2           MS. STALF: Objection. Form. Foundation.	
3   when an RD number is generated; not all the time. That		3           THE WITNESS: Again, today? Yes. Back in	
4   number is also generated for 911 calls. I lost her --		4   2000. I couldn't tell you the specifics of that.	
5   she --		5   BY MS. SAMUELS:	
6   BY MS. SAMUELS:		6       Q   Okay. When it says "Unit Assigned," do you	
7       Q   I'm sorry. I didn't mean to interrupt you.		7   know what that's referring to -- do you know what	
8       A   No. It's okay.		8   that's referring to?	
9       Q   Okay. And then "Occurrence date," is that		9           MS. STALF: Objection. Form. Foundation.	
10   something that's automatically put in there, or that		10           THE WITNESS: I believe that's a beat number.	
11   the reporting officer would put in there?		11   BY MS. SAMUELS:	
12       MS. STALF: Objection. Form. Foundation.		12       Q   Okay. When it says "IUCR Code;" do you know	
13       THE WITNESS: Again, it depends if this is an		13   what that's referring to?	
14   original case report or a sup case report, and there's		14       A   Yes.	
15   other factors. It's --		15       Q   What's that?	
16   BY MS. SAMUELS:		16       A   What's the IUCR Code, or what is the code	
17       Q   Okay. If it's an original case report, would		17   demonstrated?	
18   the Officer type it in?		18       Q   What's an IUCR code?	
19       MS. STALF: Objection. Form. Foundation.		19       A   It's basically how we classify case reports.	
20       THE WITNESS: Today? Yes. Back in 2000,		20   It's an -- it's to bring compatibility with Police	
21   I -- I don't recall.		21   Departments across the country, kind of, so they could	
22   BY MS. SAMUELS:		22   track crime. So it's a UCR code.	
23       Q   Okay. And if it's a supplementary case		23       Q   Okay. So that -- okay. So these are -- two	
24   report, would that be automatically populated because		24   are linked, where it says "0110" and then "homicide;"	

	93		94
1      is that what that 0110 means?		1      supplementary report?	
2      A      Yes.		2            MS. STALF: Objection. Form. Foundation.	
3      Q      Okay. And then I think "Location Code" is		3            THE WITNESS: I believe, in general, yes.	
4      self-explanatory.		4      BY MS. SAMUELS:	
5                Okay. As you sit here today, do you		5      Q      Okay. To your knowledge, did you have any	
6      have any specific recollection of reviewing this		6      role in the creation of this supplementary report?	
7      report?		7                And I'm sort of scrolling through it.	
8      A      No, I do not.		8      Let me know if you want me to slow down.	
9      Q      Okay. Okay. So going to the next part, it		9                Oh, that's what I was going to ask: Is	
10     looks like it's a four-page case supplementary report.		10    there always a Youth Detective assigned to a case?	
11     Begins with City NK315 and it goes to City NK318. Can		11    MS. STALF: Objection. Form. Foundation.	
12     you see that?		12    THE WITNESS: I -- I'm not sure what you are	
13     A      You have to blow it up.		13    talking about. I'm trying to --	
14     Q      Sorry.		14    BY MS. SAMUELS:	
15     A      It's okay.		15     Q      Sure. So on --	
16     Q      Okay. Just so you can see what I was seeing,		16     A      Oh, oh. That's -- no. That's Detective	
17     like, at the bottom right where it's stamped. It goes		17    slash Youth Officer.	
18     315 --		18     Q      Okay?	
19     A      Correct.		19     A      It's --	
20     Q      Three 16, 317 and then the end of the report		20     Q      So, basically, that's a Detective, but the	
21     would be 318. Okay.		21    heading just says "Detective slash Youth Investigator;"	
22                And so this report, it looks like it was		22    is that fair to say?	
23    created by Patrick Foley. When it says "created by,"		23     A      I believe so.	
24    does that mean that's the person who is authoring the		24     Q      Okay. To your knowledge, would there have	
	95		96
1      been any reason to have the Youth Investigator involved		1            MS. STALF: Objection. Form. Foundation.	
2      in this investigation?		2            THE WITNESS: Could you be more specific	
3      A      Not that I recall.		3      about the timeframe?	
4      Q      Okay. I'm sorry. And the Supplemental ID on		4      BY MS. SAMUELS:	
5      this report was 217124, correct?		5      Q      Yes, sir. So before this crime -- murder	
6      A      I would have to see it.		6      investigation for Merak Majdak, had you ever worked	
7      Q      So you see that at the top right? It sort of		7      with Detective Pietryla before that?	
8      goes, Case Report ID, RD Number, Supplemental ID.		8      A      No.	
9      A      Yes.		9      Q      And it looks like this case supplementary	
10     Q      Okay. And that one you weren't involved in.		10    report is --	
11                The next case report or supplement is a		11                Do you recall reviewing this case	
12    three-page report. It looks like it's City NK303 --		12    supplementary report?	
13    oop, what am I doing -- to City NK305; is that correct?		13    MS. STALF: Objection. Form. Foundation.	
14     A      304?		14    THE WITNESS: Is there a narrative?	
15     Q      Yeah. So 304 is Page 2. And then Page 3 is		15    MS. SAMUELS: There is no narrative that I	
16    305; is that fair?		16    can see.	
17     A      Yes.		17    THE WITNESS: I don't -- I don't recall.	
18     Q      Do you recall working with Donald Wolverton		18    BY MS. SAMUELS:	
19    during the course of this investigation?		19     Q      All right. Do you know why some case	
20                MS. STALF: Objection. Form. Foundation.		20    supplementary reports are stamped "Permanent Retention	
21                THE WITNESS: I believe I did not.		21    File," while others aren't?	
22    BY MS. SAMUELS:		22    MS. STALF: Objection. Form. Foundation.	
23     Q      All right. Had you ever worked with		23    THE WITNESS: No, I don't.	
24    detective Pietryla before?		24    BY MS. SAMUELS:	

	97		98
1        Q    After you are done with a murder		1        is that okay?	
2 investigation, what do you do with the file?		2        A    Do you know who it's created by?	
3        A    I'm sorry? I lost part of that, the end of		3                MS. STALF: Yeah, I mean, if you could let	
4 it.		4                the witness see the entire document, I think that would	
5        Q    Yeah, so once you are completed with an		5                probably be helpful, if you've got questions off the	
6 investigation into a murder, what do you do with the		6                document.	
7 file?		7                MS. SAMUELS: Sure.	
8        MS. STALF: Objection. Form. Foundation.		8        BY MS. SAMUELS:	
9                THE WITNESS: Turn it in.		9        Q    Do you still want me to Zoom it in, or do you	
10 BY MS. SAMUELS:		10      want the full page?	
11        Q    Who do you turn it in to? Is it like a		11        A    You'd have to Zoom it in. I can't read that	
12 specific person it's supposed to be turned in to?		12 at all. I'm sorry.	
13        MS. STALF: Same objection.		13        Q    No problem. So it looks like this 11-page	
14                THE WITNESS: At that time, a Supervisor. I		14 supplement was created by Donald Wolverton; is that	
15 don't know if it's different now.		15 correct?	
16 BY MS. SAMUELS:		16        MS. STALF: Objection. Form. Foundation.	
17        Q    Okay. And then it looks like the next case		17                THE WITNESS: Yes.	
18 report, the next supplementary case report under this		18        BY MS. SAMUELS:	
19 RD number is an 11-page report with the Supplementary		19        Q    And then -- I would like -- are your	
20 ID of 222288.		20 experience of the first few pages of the case	
21                I'm showing you Documents NK19 through		21 supplement the same, they contain the same information?	
22 28 -- oh, I'm sorry -- to NK29. Just so you can see,		22        MS. STALF: Objection. Form. Foundation.	
23 it's a full report. And then I'm just going to skip to		23                THE WITNESS: I don't recall.	
24 Page 4 of this report, which is the narrative section;		24	
	99		100
1 BY MS. SAMUELS:		1 down, is more information about the victim and the	
2        Q    Okay. And so I'm just trying to slowly		2 medical examiner, correct?	
3 scroll through the first few pages until we get to the		3        A    Yes.	
4 narrative section. I don't think there's anything else		4        Q    And then it looks like the -- Page 5 of this	
5 on this page.		5 report is a notification of the victim's family member;	
6                All right. And then on Page 4, it looks		6 is that correct?	
7 like there's a narrative; do you see this?		7        A    Yes, it appears correct.	
8        A    Yes.		8        Q    There's also some vehicle information. And	
9        Q    And so sort of -- you can see sort of the		9 then I think Page 6 through -- well, let's just go --	
10 first half of the narrative, which gives the date and		10 do you --	
11 time assigned, some information about the victim, the		11                Do you recall reviewing this case report	
12 victim -- and it says wanted, unknown, person, and		12 in preparation for your deposition?	
13 that's in bracket's; do you see that?		13        A    Do I recall for my deposition?	
14        A    Yes.		14        Q    Yes, sir.	
15        Q    As you sit here today, do you have any		15        A    No.	
16 recollection of whether or not you viewed this document		16        Q    All right. Do you recall reviewing this at	
17 previously?		17 the time that you were investigating the murder?	
18        MS. STALF: Objection. Form. Foundation.		18        A    I can't recall.	
19                THE WITNESS: No.		19        Q    Okay. Do you recall ever speaking to any	
20        MS. STALF: Vague as to timeframe.		20 witnesses in relation to this incident besides Jovanie,	
21                THE WITNESS: Sorry.		21 his mother and her pastor?	
22                No, I don't have a recollection.		22        A    I -- actually, I can answer that. No.	
23 BY MS. SAMUELS:		23        Q    No. So let's skip this case report, which --	
24        Q    Okay. And then the second half, I scrolled		24 well, the rest of it, which seems to be a canvas.	

	JOHN RIOORDAN	101	102
1	Let's go to -- the next document looks	1	BY MS. SAMUELS:
2	to be -- or the next case report looks to be a ten-page	2	Q Okay. And then just scrolling through this
3	case report with the supplementary -- is it the same	3	case report, which is City NK33 -- the same
4	thing?	4	information. And it looks like there's a narrative on
5	That is the same thing. It's the same	5	Page 3 of this report. And it says, "Subject to be
6	Supplemental ID. So we are going to go to -- the next	6	interviewed Yvette Hill," correct?
7	case reports seems to be a four-page record with	7	A Yes.
8	Supplementary ID 228503, correct?	8	Q All right. And this goes from Page 3 in to
9	A Correct.	9	Page 4, I believe, briefly; is that fair?
10	Q And it looks like this was reported by John	10	A Page -- yes.
11	Cruz?	11	Q All right. Do you want me to give you a
12	A Correct.	12	chance to read it? I'm just going to ask if you
13	Q Do you recall working with John Cruz during	13	remember reading this.
14	the course of this investigation?	14	A I don't recall reading this.
15	MS. STALF: Objection. Form. Foundation.	15	Q All right. And to be clear, I mean at the
16	THE WITNESS: No.	16	time that you were investigating this murder, do you
17	BY MS. SAMUELS:	17	recall reviewing this supplementary -- reviewing
18	Q All right. Prior to this investigation into	18	information like this?
19	the murder of Merak Majdak, had you ever worked with	19	MS. STALF: Object to the form of the
20	John Cruz before?	20	question.
21	MS. STALF: Objection. Form. Foundation.	21	THE WITNESS: I can't specifically recall if
22	THE WITNESS: To the best of my recollection,	22	I read this at the time or not.
23	no.	23	BY MS. SAMUELS:
24		24	Q Do you recall ever speaking with a witness
		103	104
1	known by Yvette Hill or any of those fake names under	1	Q What does that mean? Or what's that supposed
2	Yvette Hill?	2	to read? It looks like it's some sort of abbreviation.
3	MS. STALF: Objection. Foundation.	3	MS. STALF: Objection to form. Foundation.
4	THE WITNESS: No.	4	THE WITNESS: I'm not sure. This generation
5	BY MS. SAMUELS:	5	report -- I can't recall.
6	Q It looks like the next supplement is a 9-page	6	BY MS. SAMUELS:
7	supplement 393-6611 is the Supplementary ID; do you see	7	Q Is this supposed to be identified through
8	that?	8	investigation?
9	A Yes.	9	MS. STALF: Objection. Form. Foundation.
10	Q Also, created by John Cruz, correct?	10	THE WITNESS: Counselor, I don't recall. And
11	MS. STALF: Objection. Form. Foundation.	11	some of these formats have changed, so --
12	THE WITNESS: Correct.	12	And if the actual report creator fills
13	BY MS. SAMUELS:	13	it in, or if an administrative person fills it in, this
14	Q Okay. And then we are going to scroll	14	has gone through some generations. I don't recall what
15	through the first two pages, which I believe just	15	that means.
16	relist the same stuff.	16	BY MS. SAMUELS:
17	So that we can get to the narrative	17	Q All right. That's just what I wanted to make
18	section. And this report list Jovanie Long and Xavier	18	sure.
19	Walker as a suspect, correct?	19	And then it looks like on Page 4 of this
20	A Yes.	20	report is where we start the narrative section; is that
21	Q And do you see where it says, under Jovanie	21	correct?
22	Long's name, "IDENT period through INPST period,	22	A Yes.
23	question mark"?	23	Q Okay. It looks like, at this time, both,
24	A Yes.	24	Jovanie and Xavier are in custody?

	JOHN RIOORDAN	
105		106
1           MS. STALF: Objection. Form. Foundation.	1       some questions about it.	
2           THE WITNESS: Yes, it appears so.	2           MS. SAMUELS: I'm just going to ask if he	
3   BY MS. SAMUELS:	3       remembers whether he read it.	
4           Q   And it lists a number of witnesses. I don't	4           THE WITNESS: In what timeframe, if I -- I	
5   think I'm going to read them all, because there's a	5       don't recall reading it 20 years ago. I don't believe	
6   few.	6       I read it recently. I don't know.	
7           Oh, but, so -- but one question I do	7   BY MS. SAMUELS:	
8   want to ask: Is it looks like there was a sports shoe	8           Q   Okay. So that's all I was asking. And so	
9   that was inventoried as evidence; do you see that?	9       it's sort of -- this part, the narrative, goes through	
10          A   I see it, but I don't recall.	10      the witness statements of Maurice Wright and Mary	
11          Q   All right. That was going to be my question	11      Curry, and Ashanti Wright; does that change your answer	
12   was whether you recall having any role in that.	12       at all?	
13          And then -- I'm sorry. Go ahead.	13          A   I may have -- may have read it when I was	
14          A   Who? Me?	14       doing the investigation, but I can't recall	
15          Q   No, I thought I cut you off.	15       specifically.	
16          A   Oh, no. Go ahead, Counsel.	16          Q   Do you recall having any interactions,	
17          Q   And so towards the end of the page, it goes	17       whatsoever, with Antwoine Waddy?	
18   to investigation and then there seems to be a summary.	18          A   No, I don't recall.	
19   And I'm trying to scroll slower because there's a lot	19          Q   Do you recall having any interactions,	
20   of information in --	20       whatsoever, with Mary Curry?	
21          Do you want an opportunity to read this	21          A   It's -- I don't think it's Jovanie's mom --	
22   or are you good?	22       is that Jovanie's mom?	
23          MS. STALF: I would ask that the witness be	23          Q   I will stipulate that Jovanie's mother's name	
24   given a minute to read it if he is going to be asked	24       is Regina Long.	
107		108
1          A   I don't recall.	1          A   I'm sorry. I didn't know that -- if --	
2          Q   All right. Do you recall having any	2          Q   I know. It's pretty, for me, late, at this	
3   interactions, whatsoever, with Jermaica Wright?	3       point. Just trying to speed through these.	
4          A   No, I don't recall.	4           So in -- on Page 2 of this report, it	
5          Q   All right. Do you recall having any	5       says, "Suspect in custody". It says, "Yes." And the	
6   interactions, whatsoever, with -- excuse me -- Ashanti	6       first suspect listed as Jovanie Long; do you see that?	
7   Wright?	7          A   Yes.	
8          A   No. I don't believe I had any interactions	8          Q   All right. And then it gives a brief	
9   with Ashanti Wright.	9       description of his clothing where it says "Black	
10         Q   And this looks like it's -- the next	10      T-shirt". Do you see that?	
11   supplement looks like it's a six-page Case	11          A   I'm looking for it.	
12   Supplementary Report with Supplementary ID 460-312; is	12           Can I pull this closer, please?	
13   that correct?	13          MS. STALF: Yeah, go ahead.	
14          A   Where -- what number are you reading? I'm	14          THE WITNESS: All right. I see it. Yes.	
15   sorry.	15   BY MS. SAMUELS:	
16          Q   I'm sorry. So in that first box in the	16          Q   Is that what he was wearing -- would that be	
17   second line, all the way to the left, the Supplementary	17       indicating what he was wearing at the time he turned	
18   ID says 460-312.	18       himself in or at the time of the alleged offense?	
19          A   Okay. I see your thing now.	19          MS. STALF: Objection. Form. Foundation?	
20          Q   All right. And so it looks like this report	20          THE WITNESS: I don't know.	
21   was created by Michael Pietryla?	21   BY MS. SAMUELS:	
22          MS. STALF: Objection. Form. Foundation.	22          Q   All right. And then I'm scrolling through	
23   BY MS. SAMUELS:	23   this report to get to the narrative section. And it	
24          Q   Is that correct, sir?	24       looks like the narrative section starts on Page 5.	

	JOHN RIOORDAN	
		109
1	And it looks like it's an interview with	110
2	a bunch of individuals who knew the victim; is that	
3	fair?	
4	MS. STALF: Objection. Form. Foundation.	
5	THE WITNESS: I don't know.	
6	BY MS. SAMUELS:	
7	Q Do you recall reviewing this report at the	
8	time that you were assisting with the murder	
9	investigation?	
10	A No, I do not recall.	
11	Q Do you recall reviewing this report in	
12	preparation for your deposition?	
13	A No, I don't recall.	
14	Q Do you recall which supplementary report you	
15	did review that helped refresh your recollection?	
16	MS. STALF: Objection. Form. Foundation.	
17	THE WITNESS: Would be closing sup.	
18	BY MS. SAMUELS:	
19	Q So let's skip to the end.	
20	A And one other sup -- or two other supers that I	
21	was named in.	
22	Q All right. Do you recall authoring any	
23	supplementary reports?	
24	MS. STALF: Objection. Form. Foundation.	
		111
1	through -- well, it's mixed up, because 688 through	112
2	City NK71. And then Pages 5 and 6 are City NK215 and	
3	216.	
4	BY MS. SAMUELS:	
5	Q And so -- it looks -- so Page 5 and 6 --	
6	And you see, it's the same Supplementary	
7	ID 460370, correct?	
8	A Correct.	
9	Q Okay. Is this one of the reports that you	
10	reviewed?	
11	A Could you keep going?	
12	Q Yes, sir.	
13	Keep going?	
14	A Yeah.	
15	Q Okay.	
16	A Could you go back up to the top for the date	
17	of this?	
18	Q Is this -- are you talking about the date and	
19	time assigned?	
20	A No. The -- would you go further up, I think?	
21	Is it -- top page.	
22	Q Do you want the first page?	
23	A Yeah, the first page.	
24	Q Okay.	

	113		114
1	time that -- we started the shift and then we are	1	before it's -- I don't recall.
2	working on this. So...	2	BY MS. SAMUELS:
3	BY MS. SAMUELS:	3	Q All right. Do you know, one way or another,
4	Q And then under "assigned," it says Detective	4	whether you had a chance to review this report before
5	M. Pietryla and then it also says GCSP, J. Riordan,	5	it was submitted?
6	correct?	6	A I wouldn't recall.
7	A Correct.	7	Q Okay. And then that ends that report.
8	Q What does GCSP stand for?	8	Let's see -- I don't think this report
9	A Gang Crime Specialist.	9	talks about you.
10	Q Okay. Do you recall how you were able to get	10	MS. STALF: Jeanette, just so I'm clear for
11	Regina Long's phone number?	11	housekeeping purposes for each of these reports that we
12	MS. STALF: Objection. Form. Foundation.	12	are looking at, are you marking them separate exhibits
13	THE WITNESS: No, no.	13	to the deposition, or is this whole chunk of sup
14	BY MS. SAMUELS:	14	reports being marked as a single exhibit.
15	Q Do you recall how many times you had spoken	15	MS. SAMUELS: I'm not marking any of them as
16	with Regina Long prior to the 5th of June 2000?	16	exhibits.
17	A I don't believe at all.	17	MS. STALF: Okay.
18	Q And it list -- this says the report of	18	BY MS. SAMUELS:
19	Detective Pietryla and also yourself, correct?	19	Q All right. And then I'm showing you -- it's
20	A Correct.	20	a six-page report. And it looks like its Case
21	Q Generally speaking, do you have a chance to	21	Supplementary ID is 460381, correct?
22	review a report before it's finalized?	22	A Correct.
23	MS. STALF: Objection. Form. Foundation.	23	Q And this report was created by Michael
24	THE WITNESS: Before it's finalized, or	24	Pietryla?
	115		116
1	MS. STALF: Objection. Form. Foundation.	1	A You can scroll up.
2	THE WITNESS: That's what it indicates on the	2	Could you scroll back up to the top of
3	report, but I don't recall specifically.	3	this? A little more. Yeah, a little more. I want to
4	BY MS. SAMUELS:	4	see. All right.
5	Q And then scrolling to the 5th page of this	5	Q All right. That's good?
6	report is where the narrative section begins, correct?	6	A That's good.
7	A Yes, I believe so.	7	Q All right. And, again, when you reviewed
8	MS. STALF: And, again, for the record, could	8	this report and it says, "Date and time assigned," what
9	you identify that Bates Stamped document. Again, if	9	do you take that to mean?
10	you're not going to be marking these as exhibits, we're	10	A Basically, the date and time that we started
11	going to have no idea what the witness is talking about	11	working on this investigation.
12	in the deposition transcript --	12	Q All right. So when you -- do you mean the
13	MS. SAMUELS: City NK 217, 218, 219, 220, 221	13	investigation in general, or this particular narrative
14	and 222 is this six-page supplementary report that was	14	portion?
15	previously identified by its Case Supplementary ID.	15	A I believe in general, because that's the
16	BY MS. SAMUELS:	16	start of our shift.
17	Q All right. And then again, this looks like	17	Q Okay. And, essentially, this -- the
18	one of the reports where you were assigned, correct?	18	narrative portion relays a conversation that you had
19	A Yes, I believe so.	19	with Regina Long, fair?
20	Q All right. Do you want to take a chance to	20	A Yes.
21	review the narrative under "Investigation"?	21	Q All right. And this indicates status of the
22	A Sure.	22	report of, both, you and Detective Pietryla; is that
23	Q All right. Let me know when you want me to	23	correct?
24	scroll.	24	A Correct.

	117		118
1       Q    Having reviewed the report, is there anything		1       A    Correct.	
2   you like to add, edit or change?		2       Q    And what do you understand date and time	
3              MS. STALF: Objection. Form. Foundation.		3   assigned to reflect?	
4              THE WITNESS: No.		4       A    I believe it's the day and the start of my	
5   BY MS. SAMUELS:		5   shift, because our shift started at -- around 4:30, so	
6       Q    It can't be that many reports left, I swear.		6   16:30 hours.	
7              All right. So this next report is a		7       Q    Okay. It looks like, both, you and Detective	
8   six-page case supplementary, with a Case Supplementary		8   Pietryla, were assigned this particular task; is that	
9   ID of 460387; do you see that?		9   fair?	
10      A    Okay. Yes.		10     A    Correct.	
11      Q    I'm going to scroll through the report that		11     Q    All right. And the narrative section recalls	
12   begins on Bates Stamp City NK223, City NK224, City		12   in summary, a conversation with Regina Long; is that	
13   NK225, City NK226. And City NK227 is Page 5 of the		13   fair?	
14   report, correct?		14     A    Yes.	
15      A    Correct.		15     Q    And I believe this report indicates that she	
16      Q    Do you want me to slowly scroll through for		16   had spoken with Jovanie, and he intends to turn himself	
17   it -- for you?		17   in on approximately August 3rd or 4th, 2000; fair?	
18      A    Just go up a little bit so I could --		18     A    Yes.	
19   all right. You could scroll down a little bit.		19     Q    And at the bottom, it states that this is the	
20              You can stop for a second. Thank you.		20   report of, both, you and Detective Pietryla?	
21      Q    No problem.		21      MS. STALF: Objection. Form. Foundation.	
22      A    Okay.		22      THE WITNESS: Yes.	
23      Q    So it looks like the date and time assigned		23   BY MS. SAMUELS:	
24   was 28, July, 2016, 30 hours, correct?		24     Q    Is this one of the reports that you reviewed	
	119		120
1   in preparation for your deposition?		1   which begins on City NK232.	
2       A    Yes.		2              Is this the case -- is this the cleared	
3       Q    All right. As you sit here today, do you		3   case -- is this the clear closed supplementary report	
4   have any reason to believe that anything indicated in		4   you were referring to earlier?	
5   this report is inaccurate?		5       A    Yes.	
6              MS. STALF: Objection. Form. Foundation.		6       Q    All right. And I'm gonna -- do you need a	
7              THE WITNESS: As I sit here today, no.		7   chance to review it?	
8   BY MS. SAMUELS:		8       A    I would -- actually, I would like to use the	
9       Q    Okay. And I believe this is our last		9   washroom really quick before we go through this --	
10   supplementary report, at last. It's a nine-page case		10     MS. SAMUELS: Yeah, no problem.	
11   report indicated by Supplementary ID 460407; do you see		11     THE WITNESS: -- for a few minutes. Thank	
12   that?		12   you.	
13      A    I'm looking for it. Give me one second.		13     MS. STALF: Going off the record?	
14   46 -- okay. Could you repeat the number we are looking		14              Are we going off the record?	
15   at?		15     MS. SAMUELS: Oh, yeah.	
16      Q    460407.		16              (WHEREUPON, off the record.)	
17      A    All right.		17     MS. SAMUELS: Everybody here? Good to go.	
18      Q    And it looks like this report was authored by		18   BY MS. SAMUELS:	
19   Detective Pietryla.		19       Q    So where we left off, you were reviewing case	
20              MS. STALF: Objection. Form. Foundation.		20   report with supplementary ID 406407?	
21              THE WITNESS: Yes.		21     A    Correct.	
22   BY MS. SAMUELS:		22     MS. STALF: I'm sorry. I just want to make	
23      Q    All right. And it begins with City NK229.		23   sure Madam Court Reporter is back, right, and we're on	
24   And we are going to scroll to the narrative section,		24   the record?	



	125		126
1	MS. ADEEYO: Same objection.	1	We will reserve signature.
2	MS. STALF: Join.	2	(WHEREUPON, the deposition
3	THE WITNESS: Nothing that I can recall off	3	adjourned.)
4	the top of my head.	4	
5	BY MS. SAMUELS:	5	
6	Q Have you ever engaged in misconduct in the	6	
7	course and scope of your duties as a Chicago Police	7	
8	Officer?	8	
9	MS. STALF: Objection. Form. Foundation.	9	
10	MS. ADEEYO: Join.	10	
11	THE WITNESS: Not that I recall.	11	
12	BY MS. SAMUELS:	12	
13	Q Did you ever work with Chicago Police Officer	13	
14	Jerome Finnegan?	14	
15	A Oh, I worked in the same unit with him, yes.	15	
16	And I've been on details with him, yes.	16	
17	MS. SAMUELS: Okay. No further questions.	17	
18	Thank you for your time, sir.	18	
19	THE WITNESS: Thank you.	19	
20	MS. STALF: Anybody else have any questions?	20	
21	MR. OBERT: No questions.	21	
22	MS. ADEEYO: None from us.	22	
23	MS. STALF: We don't have any questions	23	
24	either.	24	

	127		128
1	XAVIER WALKER,	1	E R R A T A
2	Plaintiff,	2	DEPOSITION OF: John Riordan
3	vs.	3	DATE TAKEN: December 16, 2021
4	CITY OF CHICAGO, STANLEY SANDERS,	4	
5	MICHAEL PIETRYLA, DAVID WRIGHT,	5	PAGE LINE
6	BRIAN HOLY, JOHN CRUZ, DONALD	6	— — CHANGE: _____
7	WOLVERTON, JOHN RIORDAN, ROBERT	7	REASON: _____
8	BARTIK, ANTHONY BRZENIAK, THOMAS	8	— — CHANGE: _____
9	MAHONEY, and COOK COUNTY,	9	REASON: _____
10	Defendant.	10	— — CHANGE: _____
11		11	REASON: _____
12		12	— — CHANGE: _____
13		13	REASON: _____
14		14	— — CHANGE: _____
15		15	REASON: _____
16		16	— — CHANGE: _____
17	JOHN RIORDAN	17	REASON: _____
18	No corrections (Please initial) _____	18	— — CHANGE: _____
19	Number of errata sheets submitted _____ (pages)	19	REASON: _____
20	SUBSCRIBED AND SWORN TO	20	— — CHANGE: _____
21	BEFORE ME THIS _____ DAY	21	REASON: _____
22	OF _____, 2022.	22	
23		23	DEPONENT'S SIGNATURE _____
24	NOTARY PUBLIC	24	DATE: _____

1                   **E R R A T A**

2    DEPOSITION OF: John Riordan

3    DATE TAKEN: December 16, 2021

4

## 5    P A G E   L I N E

6    \_\_\_\_ CHANGE: \_\_\_\_\_

7    REASON: \_\_\_\_\_

8    \_\_\_\_ CHANGE: \_\_\_\_\_

9    REASON: \_\_\_\_\_

10   \_\_\_\_ CHANGE: \_\_\_\_\_

11   REASON: \_\_\_\_\_

12   \_\_\_\_ CHANGE: \_\_\_\_\_

13   REASON: \_\_\_\_\_

14   \_\_\_\_ CHANGE: \_\_\_\_\_

15   REASON: \_\_\_\_\_

16   \_\_\_\_ CHANGE: \_\_\_\_\_

17   REASON: \_\_\_\_\_

18   \_\_\_\_ CHANGE: \_\_\_\_\_

19   REASON: \_\_\_\_\_

20   \_\_\_\_ CHANGE: \_\_\_\_\_

21   REASON: \_\_\_\_\_

22

23   DEPONENT'S SIGNATURE\_\_\_\_\_

24    DATE: \_\_\_\_\_

129

JOHN RIORDAN

130

1    STATE OF ILLINOIS      }ss  
2    COUNTY OF C O O K      }

3

4                   **C E R T I F I C A T E**

5

6                   The within and deposition was taken  
7    before ADRIENNE M. LIGHTFOOT, Certified Shorthand  
8    Reporter in the City of Chicago, County of Cook and  
9    State of Illinois; and there were present at the  
10   deposition Counsel as previously set forth?

11                   The witness reserved signature.

12                   The undersigned is not interested in the  
13    within case nor of kin or counsel to any of the  
14    parties.15                   IN TESTIMONY WHEREOF, I have hereunto  
16    set my hand this 3rd day of June 2022.17                   \_\_\_\_\_  
18                   ADRIENNE M. LIGHTFOOT19                   No. 084-004276  
20

21

22

23

24